

# **Exhibit G**

(Copies of the Monthly Fee Applications)

## **Dentons US LLP First Monthly Fee Application**

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re:

FIRST GUARANTY MORTGAGE  
CORPORATION, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-10584 (CTG)

(Jointly Administered)

Objection Deadline: November 7, 2022 at 4:00  
p.m. (prevailing Eastern Time)

**SUMMARY OF FIRST MONTHLY FEE APPLICATION OF  
DENTONS US LLP AS COUNSEL FOR THE DEBTORS AND DEBTORS IN  
POSSESSION, FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT  
OF EXPENSES FOR THE PERIOD FROM JUNE 30, 2022 THROUGH JULY 31, 2022**

General Information	
Name of Applicant:	Dentons US LLP
Authorized to Provide Services to:	Debtors and Debtors in Possession
Date of Retention:	Effective to June 30, 2022, by order signed on or about August 2, 2022
Period for Which Compensation and Expense Reimbursement is Sought:	June 30, 2022, through July 31, 2022
Amount of Compensation Sought as Actual, Reasonable, and Necessary:	\$1,581,348.00
Amount of payment sought:	\$1,265,078.40
Amount of Expense Reimbursement Sought As Actual, Reasonable, and Necessary:	\$3,915.98

This is a ✓ monthly                      interim        final application.

This is Dentons's first monthly fee application.

<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's tax identification number, are: First Guaranty Mortgage Corporation (9575); and Maverick II Holdings, LLC (5621). The location of the corporate headquarters and the service address for First Guaranty Mortgage Corporation is 5800 Tennyson Parkway, Suite 450, Plano, TX 75024.



Date Filed	Period Covered	Requested Fees	Requested Expenses	Approved Fees	Approved Expenses

No prior fee applications have been filed.

### **DUS PROFESSIONALS**

Name of Professional Individual	Position of the Applicant, Year of Obtaining License to Practice, Year of Joining the Firm	Department	Hourly Billing Rate	Total Interim Hours Billed	Total Interim Compensation
Claude D. Montgomery	Partner - Admitted to the Bar in 1984; Joined the Firm in 2002	Restructuring Insolvency & Bankruptcy Litigation	\$1,210	171	\$206,910.00
Lynn P. Harrison, III	Partner - Admitted to the Bar in 1984; Joined the Firm in 2020	Restructuring Insolvency & Bankruptcy Litigation	\$1,140	98.60	\$112,404.00
Philip A. O'Connell, Jr.	Partner - Admitted to the Bar in 1983; Joined the Firm in 1983	Commercial Litigation	\$1,105	0.30	\$331.50
Jeffrey J. Murphy	Partner - Admitted to the Bar in 1984; Joined the Firm in 1985	Capital Markets	\$1,045	24.10	\$25,184.50
E. Lee Smith	Partner - Admitted to the Bar in 1986; Joined the Firm in 2003	Capital Markets	\$1,025	158.30	\$162,257.50
Drew Marrocco	Partner - Admitted to the Bar in 1985; Joined the Firm in 1995	Commercial Litigation	\$1,020	3.80	\$3,876.00
Sam J. Alberts	Partner - Admitted to the Bar in 1993; Joined the Firm in 2011	Restructuring Insolvency & Bankruptcy Litigation	\$990	102.40	\$101,376.00
Sandra McCandless	Partner - Admitted to the Bar in 1973; Joined the Firm in 1994	Employment & Labor	\$985	64.80	\$63,828.00
Samuel R. Maizel	Partner - Admitted to the Bar in 1985; Joined the Firm in 2015	Restructuring Insolvency & Bankruptcy Litigation	\$970	117	\$113,490.00
Robert E. Richards	Partner - Admitted to the Bar in 1988; Joined the Firm in 1988	Restructuring Insolvency & Bankruptcy Litigation	\$940	4.40	\$4,136.00
Roger K. Heidenreich	Partner - Admitted to the Bar in 1983; Joined the Firm in 1983	Commercial Litigation	\$930	5.70	\$5,301.00
Nicole Mersky	Partner - Admitted to the Bar in 2001; Joined the Firm in 2021	Capital Markets	\$895	1.30	\$1,163.50
Christopher D. O'Leary	Partner - Admitted to the Bar in 2009; Joined the Firm in 2014	Capital Markets	\$850	150.30	\$127,755.00
Tania M. Moyron	Partner - Admitted to the Bar in 2005; Joined the Firm in 2017	Restructuring Insolvency & Bankruptcy Litigation	\$790	314.80	\$248,692.00

<b>Name of Professional Individual</b>	<b>Position of the Applicant, Year of Obtaining License to Practice, Year of Joining the Firm</b>	<b>Department</b>	<b>Hourly Billing Rate</b>	<b>Total Interim Hours Billed</b>	<b>Total Interim Compensation</b>
Geoffrey M. Miller	Partner - Admitted to the Bar in 2012; Joined the Firm in 2014	Restructuring Insolvency & Bankruptcy Litigation	\$770	45.10	\$34,727.00
Lauren M. Macksoud	Partner - Admitted to the Bar in 2003; Joined the Firm in 2017	Restructuring Insolvency & Bankruptcy Litigation	\$770	144.20	\$111,034.00
Casey W. Doherty, Jr.	Senior Managing Associate - Admitted to the Bar in 2011; Joined the Firm in 2021	Restructuring Insolvency & Bankruptcy Litigation	\$695	87.90	\$61,090.50
Malka S. Zeefe	Counsel - Admitted to the Bar in 2005; Joined the Firm in 2017	Restructuring Insolvency & Bankruptcy Litigation	\$690	7.10	\$4,899.00
Andrew M. Pendexter	Senior Managing Associate - Admitted to the Bar in 2011; Joined the Firm in 2021	Capital Markets	\$680	1.00	\$680.00
Jeffrey C. Nelson	Managing Associate - Admitted to the Bar in 2017; Joined the Firm in 2017	Capital Markets	\$680	6.20	\$4,216.00
Sarah M. Schrag	Managing Associate - Admitted to the Bar in 2016; Joined the Firm in 2016	Restructuring Insolvency & Bankruptcy Litigation	\$650	120.70	\$78,455.00
David F. Cook	Managing Associate - Admitted to the Bar in 2017; Joined the Firm in 2019	Bankruptcy	\$620	151.90	\$94,178.00
Jessica Peterson	Associate - Admitted to the Bar in 2019; Joined the Firm in 2022	Employment & Labor	\$525	0.90	\$472.50
George L. Medina	Senior Paralegal	Restructuring Insolvency & Bankruptcy Litigation	\$360	23.60	\$8,496.00
Elizabeth S. Cobarrubias	Senior Research Specialist	Knowledge/Practice Innovation	\$350	0.50	\$175.00
Kathryn Howard	Senior Paralegal	Restructuring Insolvency & Bankruptcy Litigation	\$340	17.70	\$6,018.00
Jack I. Milko	Paralegal	Capital Markets	\$320	0.30	\$96.00
Timothy M. Fowler	Supervisor, Senior Research Specialist	Knowledge/Practice Innovation	\$265	0.40	\$106.00

**Grand Total: \$1,581,348.00**  
**Total Hours 1,824.30**  
**Blended Rate: \$866.82**

**COMPENSATION BY PROJECT CATEGORY**

<b>Task Code</b>	<b>Matter Description</b>	<b>Total Hours Billed</b>	<b>Total Fees Requested</b>
B110	Case Administration	331.60	\$258,332.50
B120	Asset Analysis and Recovery	8.80	\$6,456.00
B130	Asset Disposition	199.10	\$204,055.00
B140	Relief from Stay/Adequate Protection Proceedings	30.80	\$24,315.50
B150	Meetings of/and Communications with Creditors	25.10	\$25,482.50
B160	Fee/Employment Applications	28.20	\$19,855.00
B185	Assumption/Rejection of Leases and Contracts	48.00	\$32,184.00
B190	Other Contested Matters (excl. assumption/rejection motions)	42.60	\$35,603.00
B200	Operations	1.50	\$1,537.50
B210	Business Operations	33.00	\$29,216.50
B220	Employee Benefits/Pension	192.00	\$163,581.50
B230	Financing/Cash Collections	663.80	\$598,035.00
B260	Board of Directors Matters	42.50	\$36,398.50
B300	Claims and Plan	27.70	\$18,078.50
B310	Claims Administration and Objections	16.30	\$12,469.00
B320	Plan and Disclosure Statement (incl. Business Plan	5.10	\$5,315.00
B400	Bankruptcy-Related Advice	32.90	\$25,333.00
B410	General Bankruptcy Advice/Opinions	0.50	\$325.00
EMP	Employee matters	90.80	\$80,741.00
INS	Insurance	0.20	\$158.00
WARNACT	Warn Act Issues	3.80	\$3,876.00
<b>Total</b>		<b>1,824.30</b>	<b>\$1,581,348.00</b>

**EXPENSE SUMMARY**

<b>Expense Category</b>	<b>Service Provider (if applicable)</b>	<b>Total Expenses</b>
Delivery & Postage	Federal Express	\$117.38
Court Fees	Notice of Bankruptcy and Automatic Stay filed in <i>Nyankymah v. Latortue</i> Case No. 22- cv-000575-P1.	\$35.60
Research Fees	David F. Cook	\$3,455.24
Research Fees	Timothy M. Fowler	\$307.76
<b>Total Disbursements Requested</b>		<b>\$3,915.98</b>

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FIRST GUARANTY MORTGAGE  
CORPORATION, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-10584 (CTG)

(Jointly Administered)

**Objection Deadline: November 7, 2022 at 4:00 p.m.**  
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**FIRST MONTHLY FEE APPLICATION OF  
DENTONS US LLP AS COUNSEL FOR THE DEBTORS AND DEBTORS IN  
POSSESSION, FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT  
OF EXPENSES FOR THE PERIOD FROM JUNE 30, 2022 THROUGH JULY 31, 2022**

Pursuant to §§ 330 and 331 of Title 11 of the United States Code (the “Bankruptcy Code”) and Rule 2016 of the Federal Rules of Bankruptcy Procedure (collectively, the “Bankruptcy Rules”), and the “Order (I) Approving Procedures for (A) Interim Compensation and Reimbursement of Expenses of Retained Professionals and (B) Expense Reimbursement for Official Committee Members and (II) Granting Related Relief,” signed on or about August 2, 2022 (the “Administrative Order”), Dentons US LLP (“DUS” or the “Firm”), counsel to the debtors and the debtors in possession in the above-captioned cases (the “Debtors”), hereby submits its *First Monthly Application for Compensation and for Reimbursement of Expenses for the Period from June 30, 2022 through July 31, 2022* (the “Application”).

By this Application, DUS seeks a monthly interim allowance of compensation in the amount of \$1,581,348.00 and actual and necessary expenses in the amount of \$3,915.98 for a total allowance of \$1,585,263.98 and payment of \$1,265,078.40 (80% of the allowed fees) and

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<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s tax identification number, are: First Guaranty Mortgage Corporation (9575); and Maverick II Holdings, LLC (5621). The location of the corporate headquarters and the service address for First Guaranty Mortgage Corporation is 5800 Tennyson Parkway, Suite 450, Plano, TX 75024.

reimbursement of \$3,915.98 (100% of the allowed expenses) for a total payment of \$1,268,994.38 for the period June 30, 2022, through July 31, 2022 (the “Interim Period”). In support of this Application, DUS respectfully represents as follows:

### **Background**

1. On June 30, 2022 (the “Petition Date”), the Debtors commenced their Chapter 11 cases by filing voluntary petitions for relief under chapter 11 of the Bankruptcy Code. The Debtors have continued in possession of their property and continued to operate and manage their businesses as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No trustee or examiner has been appointed in the Debtors’ chapter 11 cases.

2. The Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2).

3. On or about August 2, 2022, the Court signed the Administrative Order, authorizing certain professionals (“Professionals”) to submit monthly applications for interim compensation and reimbursement for expenses, pursuant to the procedures specified therein. The Administrative Order provides, among other things, that a Professional may submit monthly fee applications. If no objections are made within fourteen (14) days after service of the monthly fee application the Debtors are authorized to pay the Professional eighty percent (80%) of the requested fees and one hundred percent (100%) of the requested expenses. Beginning with the period ending September 30, 2022, and at three-month intervals thereafter, each of the Professionals shall file and serve an interim application for allowance of the amounts sought in its monthly fee applications for that period. All fees and expenses paid are on an interim basis until the final allowance by the Court.

4. The Court approved the retention of DUS, effective as of June 30, 2022, by this Court’s *Order Authorizing and Approving the Retention of Dentons US LLP as Counsel to the*

*debtors and debtors in possession Effective as of June 30, 2022*, [Docket No. 277] (the “Retention Order”). The Retention Order authorized DUS to be compensated on an hourly basis and to be reimbursed for actual and necessary out-of-pocket expenses.

**DUS APPLICATION FOR COMPENSATION  
AND FOR REIMBURSEMENT OF EXPENSES**

5. All services for which DUS requests compensation were performed for or on behalf of the Debtors.

6. DUS has received no payment and no promises for payment from any source other than the Debtors for services rendered or to be rendered in any capacity whatsoever in connection with the matters covered by this Application. There is no agreement or understanding between DUS and any other person other than the partners of DUS for the sharing of compensation to be received for services rendered in these cases. As set forth in its employment application.

**Fee Statements**

7. The fee statement for the Interim Period is attached hereto as Exhibit A. This statement contain daily time logs describing the time spent by each attorney and paraprofessional during the Interim Period. To the best of DUS’s knowledge, this Application complies with §§ 330 and 331 of the Bankruptcy Code and the Bankruptcy Rules. DUS’s time reports are initially handwritten by the attorney or paralegal performing the described services. The time reports are organized on a daily basis. DUS is particularly sensitive to issues of “lumping” and unless time was spent in a one-time frame on a variety of different matters for a particular client, separate time entries are set forth in the time reports. DUS’s charges for its professional services are based upon the time, nature, extent, and value of such services and the cost of comparable services other than in a case under the Bankruptcy Code.

### **Actual and Necessary Expenses**

8. A summary of actual and necessary expenses incurred by DUS for the Interim Period is attached hereto as part of Exhibit A. DUS represents that: (i) it does not charge for internal printing; (ii) it does not charge for outgoing or incoming facsimile transmissions in bankruptcy matters; and (iii) with respect to providers of on-line legal research services (e.g., LEXIS and WESTLAW), there is no surcharge for computerized legal research.

9. DUS believes the foregoing rates are the market rates that the majority of law firms charge clients for such services. In addition, DUS believes that such charges are in accordance with the American Bar Association's ("ABA") guidelines, as set forth in the ABA's Statement of Principles, dated January 12, 1995, regarding billing for disbursements and other charges.

### **Summary of Services Rendered**

10. The names of the partners and associates of DUS who have rendered professional services in these cases during the Interim Period, the paralegals and research assistants of DUS who provided services to these attorneys during the Interim Period, are set forth in the attached Exhibit A.

11. DUS by and through such persons, has prepared and assisted in the preparation of various motions and orders submitted to the Court for consideration, and advised the Debtors on a regular basis with respect to various matters in connection with the Debtors' bankruptcy cases, and performed all necessary professional services which are described and narrated in detail below. DUS's efforts were extensive due to the size and complexity of the Debtors' bankruptcy cases.

### **Summary of Services by Project**

12. The services rendered by DUS during the Interim Period can be grouped into the categories set forth below. DUS attempted to place the services provided in the category that best relates to such services. However, because certain services may relate to one or more categories,

services pertaining to one category may in fact be included in another category. These services performed, by categories, are generally described below, with a more detailed identification of the actual services provided set forth on the attached Exhibit A. Exhibit A identifies the attorneys and paraprofessionals who rendered services relating to each category, along with the number of hours for each individual and the total compensation sought for each category.

**Case Administration B110.** This category relates to work regarding the general administration of the Debtors' bankruptcy cases and the observance of proper corporate formalities. During the first month of the case, Dentons prepared and filed a multitude of motions (collectively, the "Motion") and obtained entry of orders thereon, including:

- *Debtors' Motion For Order Directing Joint Administration Of Related Chapter 11 Cases For Procedural Purposes Only;*
- *Debtors' Motion Seeking Entry Of An Order (I) Authorizing The Debtors To (A) File A Consolidated List Of Creditors In Lieu Of Submitting A Separate Mailing Matrix For Each Debtor, (B) File A Consolidated List Of Debtors' Three Largest Unsecured Creditors, And (C) Redact Certain Personally Identifiable Information For Individual Creditors And Interest Holders And (II) Granting Related Relief;*
- *Motion Of The Debtors For Entry Of Interim And Final Orders: (I) Authorizing User Cash Management Procedures, Bank Accounts And Certain Payment Methods; (II) Prohibiting Set Offs And Freezing Of Bank Accounts; (III) Modifying Requirements Of Section 345(b) Of The Bankruptcy Code; And (IV) For Related Relief (the "Cash Management Motion");*
- *Motion Of The Debtors For Entry Of Order (I) Authorizing The Debtors To Continue (A) Insurance Programs And (B) Pre-Petition Surety Bonds, And Pay Obligations Arising Thereunder, And (II) Related Relief (the "Insurance Motion");*
- *Motion Of The Debtors For Entry Of Interim And Final Orders (A) Authorizing Debtors To Pay Pre-Petition Claims Of Critical Vendors And (B) Granting Related Relief (the "Critical Vendors Motion");*
- *Motion Of The Debtors Pursuant To 11 U.S.C. §§ 105(a) And 366 And Federal Rules Of Bankruptcy Procedures 6003 And 6004 For Entry Of Interim And Final Orders (I) Approving Debtors' Proposed Form Of Adequate Assurance Of Payment To Utility Companies, (II) Establishing Procedures For Resolving Objections By Utility Companies, (III) Prohibiting Utility Companies From Altering, Refusing,*

*Or Discontinuing Service, And (IV) Granting Related Relief (the “Utilities Motion”); and*

- *Motion Of Debtors For Entry Of Interim And Final Orders (I) Authorizing Debtors To (A) Pay Employee Obligations And (B) Continue Employee Benefit Programs, And (II) Granting Related Relief (the “Employee Wage Motion”).*

Also during the first month of the case, DUS prepared, filed and obtained entry of orders on the *Debtor’s Application For Order Appointing Kurtzman Carson Consultants LLC As Claims And Noticing Agent* and the *Application To Employ/Retain FTI Consulting, Inc., (I) To Provide The Debtors A Chief Restructuring Officer And Certain Additional Personnel [And] (II) Designating Tanya Meerovich As Chief Restructuring Officer For Debtors Effective As Of The Petition Date.*

During this period, DUS: (a) regularly corresponded with the Debtors, Pachulski Stang Ziehl & Jones (“Local Counsel” or “PSZ&J”), FTI Consulting (“FTI”) and Kurtzman Carson Consultants, LLC (“KCC”) on all matters related to the Cases, including the Motions, operations, the administration of the case, and related matters; (b) corresponded and interfaced with counsel for creditors; (c) considered cash management issues, regulatory issues and violations of the stay; (d) prepared and finalized the *Declaration In Support Of Chapter 11 Petitions And First Day Pleadings*, sought and obtained a hearing on July 1, 2022, coordinating with Local Counsel on the filings, and preparation for and attendance at the initial hearing on the first day motions (and subsequent hearings); (e) responded to requests and comments from the U.S. Trustee on the first day motions and other pleadings filed in behalf of the Debtors; ; (f) conducted internal conferences related to pending issues, including refinancing of loans, a key employee retention program (“KERP”) and a key employee incentive program (“KEIP”), demands from warehouse lenders, lease issues, WARN ACT and related employment issues, pending lawsuits, preparation of the *Schedules and Statements Of Financial Affairs*, ordinary course professionals, Freddie Mac

pending loans, U.S. Department of Justice issues, issues relating to GNMA/FHA (“Ginnie Mae”), Fannie Mae guaranty fees and Fannie Mae payments; (g) interfaced with the U.S. Trustee on the Initial Debtor Interview (“IDI”) on multiple subjects, conferring with the U.S. Trustee on fees, various bank accounts, and other IDI matters; (h) conferred with counsel for South Street Securities, LLC, regarding a potential objection to the Debtors’ DIP financing motion and with counsel for Flagstar Bank regarding a § 506(c) waiver issue; (i) prepared and filed a *Motion To Extend Time To File Schedules Of Assets And Liabilities And Statements Of Financial Affairs* and continued to prepare the *Schedules* and *Statement Of Financial Affairs*; (j) reviewed and considered objections and reservations of rights filed by Customers Bank, Flagstar Bank, Federal National Mortgage Association, The Federal Home Loan Mortgage Corporation and the Official Committee of Unsecured Creditors to the *Cash Management Motion*; (k) managed superior court and district court litigation; and (l) prepared “Notices of Bankruptcy Stay” filed in multiple pending proceedings.

**Fees: \$258,332.50     Hours: 331.60**

13. **Asset Analysis and Recovery B120.** This category includes DUS’ services related to: (a) analyzing the Debtors’ Repurchase Agreements, recoupment of severance payments, asset scenarios, potential purchase of assets, liquidation of loans, warehouse lines and termination of repurchase agreements, the loan sale process and liquidation of collateral; (b) preparation of materials regarding agency servicing process; (c) working with subservicer to comply with asset segregation demands made by warehouse providers, also reviewing warehouse liquidity agreement enforcement rights; (d) internal conferences related to OCB and servicer issues; and (e) work on a motion for approval of sale of mortgage servicing rights (“MSR”).

**Fees: \$6,456.00     Hours: 8.80**

14. **Asset Disposition B130.** In connection with work on Asset Disposition, DUS: (a) reviewed and responded on issues related to repo agreement and related documents with Barclays' Bank ("Barclays"); (b) conferred with counsel for Barclays regarding issues with GMNA pooling of Barclay Bank's slate of loans; (c) considered the sales of some or all assets and external calls on the potential sales of assets; (d) conferred with Freddie Mac representatives on the disposition of loans; (e) conferred with attorneys for Texas Capital Bank ("TCB") regarding facilitation and liquidation of loans on the TCB warehouse line; (f) conferred with representatives of Customers Bank and Flagstar Bank on disposal of assets on warehouse lines of credit; (g) performed an analysis of warehouse loan sale options in consideration of collapsing the GMNA Pool of Assets; (h) conferred on warehouse provider collateral liquidation and consideration of cash management issues; (i) held discussions with Customers Bank and FTI regarding establishment of an agreement on segregation for the benefit of warehouse providers and direct sale proceeds; (j) exchanged information on clearance of advances; (k) conferred with FTI on MSR sales and reviewed servicing sale materials describing the MSR process; (l) researched and drafted a *Motion For Sale Of Mortgage Servicing Rights*; and (m) analyzed issues related to potential sale of real estate licenses, and consideration of issues related to sale of mortgage servicing rights. **Fees: \$204,055.00 Hours: 199.10**

15. **Relief from Stay/Adequate Protection Proceedings B140.** This category relates to DUS' services rendered related to: (a) segregating matters regarding warehouse lenders, including segregation of collateral and remittance of cash collateral proceeds; (b) analyzed pending litigation subject to the automatic stay; (c) analyzed and correspond with vendors with executory contracts who breached their contract by ceasing services; (d) prepared "Notices of Bankruptcy Stay" filed in multiple pending cases and related matters; and (e) *Customers Bank's Motion Seeking Confirmation of Applicability of 11 U.S.C. §559, or, in the Alternative, Granting Relief*

from the Automatic Stay and Related Relief, and related matters, including analysis and responses thereto from third parties.

**Fees: \$24,315.50      Hours: 30.80**

16. **Meetings of/and Communications with Creditors B150.** The services performed in this category includes: (a) discussions with U.S. Department of Justice on background to and status of the bankruptcy case; and (b) communications regarding selection of the creditors' committee and its counsel, and discussions with the creditors' committee and its counsel once selected, including attending meetings with the creditors' committee.

**Fees: \$25,482.50      Hours: 25.10**

17. **Fee/Employment Applications B160.** This category's service includes: (a) DUS' preparation and filing of the *Motion to Employ/Retain Dentons US LLP as Counsel for Debtors and Debtors in Possession Effective as of the Petition Date*, and the preparation and filing of Declarations in support of that application; (b) Dentons' preparation and filing of the Debtors' *Motion For Entry Of Order (I) Authorizing Employment And Payment Of Professionals Utilized In The Ordinary Course Of Business And (II) Granting Related Relief* (the "Ordinary Course Professional Motion"); and (c) Dentons' preparation of *Motion for Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals*. All three motions were granted, and orders were entered thereon. Dentons also reviewed and analyzed other professionals' applications for employment.

**Fees: \$19,855.00      Hours: 28.20**

18. **Assumption/Rejection of Leases and Contracts B185.** DUS conducted a review of the Debtors' leases, preparing an initial, then revised list of leases, drafted an analysis of the leases and deposits and conferred with various outside parties on leases to be rejected. Dentons conducted research regarding security deposits and post-petition rents. In connection with the

assumption and rejection of leases and contracts, Dentons prepared and filed the *Debtors' Omnibus Motion For An Order (I) Authorizing Debtors To (A) Reject Certain Unexpired Leases Effective As Of July 29, 2022; And (B) Abandon Certain Property Associated Therewith; And (II) Granting Certain Related Relief*.

**Fees: \$32,184.00      Hours: 48.00**

19. **Other Contested Matters B190.** DUS' services rendered in this category include: (a) initial review and assessment of a *Class Action Adversary Proceeding Complaint For Violation Of The WARN Act, 29 U.S.C. § 2101* (the "WARN Act Class Action") filed by Lori Buckley, Gale Zech, Robert Martinez, Jennifer Jackson and James Davies; (b) discussion of strategy regarding defense of that WARN Act Class Action, and conducting an initial analysis of issues related to false claims act claims; and (c) preparing for hearings on the motions identified in Case Administration above.

**Fees: \$35,603.00      Hours: 42.60**

20. **Operations B200.** In connection with this category of service, DUS and third parties engaged in conferences regarding the existing warehouse lines of credit and "wet funding" on a new warehouse line of credit, operational issues and a review of pre-petition warehouse provider engagement.

**Fees: \$1,537.50      Hours: 1.50**

21. **Business Operations B210.** DUSs: (a) reviewed the U.S. Trustee's comments on the Utilities Motion; (b) prepared and filed the Ordinary Course Professional Motion and conferred with outside parties on the list of ordinary course professionals; (c) conferred with outside counsel regarding the debtor-in-possession financing budget; (d) reviewed loan fundings and loan servicing; (e) reviewed and facilitation of workstreams on asset sales by warehouse providers, asset disposal and cash management; (f) in connection with the Critical Vendors Motion, analyzed

critical vendor payments and issues related to those payments; (h) reviewed financing of asset disposal work issues; and (i) held outside calls on both ordinary course professionals and critical vendors.

**Fees: \$29,216.50      Hours: 33.00**

22. **Employee Benefits / Pension B220.** This category of service includes: (a) preparation of the Employee Wage Motion; (b) internal and external conferences regarding KEIP and KERP; (c) review of the WARN Act Class Action; internal strategy discussions regarding WARN claims and review and analysis of case law involving potential waiver of WARN claims by employees who receive KEIP/KERP benefits, and communications regarding potential bankruptcy defenses to WARN claims related to payment of severance; (d) preparation of the *Motion Of Debtors For Entry Of Order (I) Approving Key Employee Incentive Program, (II) Key Retention Employee Program And (III) Granting Related Relief* (the “KEIP/KERP Motion”) and preparing a *Motion to Shorten Time on the KEIP/KERP Motion*; (e) reviewing and responding to emails from employees and outside attorneys regarding employee issues and consideration of employee notice issues; (f) drafting notices to employees regarding KEIP and KERP; (g) reviewing and responding to emails regarding labor issues; (h) developing strategy for fact investigations and potential defenses to class action complaints; (i) consideration of pre- versus post-petition commission payments; (j) correspond, confer and strategizing with the Debtors and FTI regarding the foregoing; and (k) review of and responding to correspondence regarding the Wage Motion and the KEIP/KERP Motion.

**Fees: \$163,581.50      Hours: 192.00**

23. **Financing / Cash Collections B230.** In connection with this category of service, DUS prepared and filed *Debtors Motion For Entry Of Interim And Final Orders (I) Authorizing The Debtors To Enter Into Repurchase Agreement Facilities: (II) Authorizing The Debtors To Sell*

*And Repurchase Mortgage Loans In The Ordinary Course Of Business: (III) Granting The Means Of Providing Super-Priority Of Administrative Expense Status: (IV) Modifying The Automatic Stay: (V) Scheduling The Final Hearing With The Respect To The Relief Request To Hearing: (VI) Granting Related Relief*, and concurrently prepared and filed a *Motion To Approve Debtor-In-Possession Financing*. In connection therewith, DUS analyzed a multitude of issues and conferred, correspond and strategize with the Debtors, FTI, and PSZJ, and third parties; negotiated and, ultimately, reached an agreement on the two motions. In response to the debtors two motions, DUS conferred and negotiated with: counsel for Customers Bank on *Customers Bank's Emergency Motion to Continue Debtors: (1) Cash Management Motion: (2) Cash Flow Debtor-In-Possession Motion: (3) Repurchase Agreement Motion*, and *Customer Bank's Motion Seeking Interim And Final Relief Requiring Debtors To Segregate An Account For Cash Collateral In Complaints With 11 U.S.C. § 36C3(c)(4)*; counsel for Flagstar Bank, *FSB's Preliminary Objection To Debtors Finance And Motions And Cash Management Motion.*; counsel for South Street Securities LLC, on its *Reservation Of Rights To Debtor's Financing Motions And Cash Management Motion*; counsel for the unsecured creditors' committee on its objection to the proposed "REPO" financing and Debtor-in-Possession "cashflow" financing; counsel for the Federal National Mortgage Association on reservation of rights concerning the Debtors' two motions; counsel for the Federal Home Loan Mortgage Corporation on a reservation of rights also related to the Debtors' two motions; the U.S. Trustee on the U.S. Trustee's objection to the Debtors' motions; and counsel for Rushmore Loan Management Services LLC, with respect to its reservation of rights on the Debtors' two motions. DUS continued to work with parties in interest and strategize with Debtors, local counsel, FTI and DUS team members regarding intercreditor issues, adequate protection motions, the DIP budget, custodial agreements, the DIP master repurchase agreement, closing deliverables and roll over issues, DIP Term Sheet, JVB and TCB facilities, Morgan Stanley Master

Service Forward Transaction Agreement, the sale process and related matters, FreddieMac and FannieMae related matters, servicer segregation requests and segregation of warehouse provider loans and loan sale proceeds, Barclays funding issues and pending financing issues, financial regulators' information requests and open financing facility issues.

**Fees: \$598,035.00      Hours: 663.80**

24. **Board of Directors Matters B260.** This category of service includes, preparation for, attending and making presentations to the Debtors' board of directors meetings in fifteen meetings regarding Case matters, first-day motions, labor matters, potential plan of reorganization, asset sales, contested matters, budgetary issues, KERP/KEIP, and other various work stream,.

**Fees: \$36,398.50      Hours: 42.50**

25. **Claims and Plan B300.** In this category, Dentons analyzed a possible liquidation plan, reviewed ideas for a reorganization, prepared and reviewed a plan term sheet, and considered the timing for filing of a plan.

**Fees: \$18,078.50      Hours: 27.70**

26. **Claims Administration and Objections B310.** In this category of service, DUS: conducted a telephone call on the Synergy pre-petition claims; considered payment of critical vendors; reviewed and prepared the order on the final Critical Vendors Motion; considered the Deutsche Bank pre-petition claim; and reviewed a term sheet regarding a Freddie Mac settlement.

**Fees: \$12,469.00      Hours: 16.30**

27. **Plan and Disclosure Statement B320.** Included within this category of service is Dentons' consideration of a combined disclosure statement and plan, additional consideration on timing for filing a plan, and additional review of a plan term sheet.

**Fees: \$5,315.00      Hours: 5.10**

28. **Bankruptcy Related Advice B400.** Included in this category of service is: review of numerous emails regarding closing and funding of debtor-in-possession financing; discussion and consideration of safe harbor issues; discussion and consideration cash management issues and account issues; review of the cash management order; and review of drafts of the order on debtor-in-possession financing.

**Fees: \$25,333.00      Hours: 32.90**

29. **General Bankruptcy Advice B410.** DUS advised the Debtors and FTI J regarding outstanding issues, including litigation notices, the initial interview with the U.S. Trustee, and follow-up regarding “pipeline” and servicing of loans.

**Fees: \$325.00      Hours: 0.50**

30. **Employee Matters EMP.** Included in this category of service is: (a) in regard to the WARN Act, a review and analysis of the WARN Act Class Action, preparing questions and background information to discuss planning for WARN Act Notices, strategy, handling and information required to proceed with WARN Act Notices; analyzing issues related to WARN and KERP/KEIP, drafting of and revisions to WARN Act Notices, and consideration on timing of sending WARN Act Notices; (b) preparation and review of proposed responses to a June 27th report in *The Dallas Morning News* on layoffs of employees, as well as preparation and review of responses to other press inquiries; (c) review of communications with employees on layoffs; and (d) analysis of various employment matters, including priority payments; and (e) consideration of issues related to insiders.

**Fees: \$80,741.00      Hours: 90.80**

31. **Insurance INS.** Work in this category of service was limited to internal correspondence on the order on the Insurance Motion.

**Fees: \$158.00      Hours: 0.20**

32. **Warn Act Issues.** Included in this category of service are conferences and review of documents regarding the WARN Class Action Case.

**Fees: \$3,876.00      Hours: 3.80**

**DUS PROFESSIONALS**

33. Attorneys and paraprofessionals of DUS expended a total of 1,824.30 hours in connection with their representation of the Committee during the Interim Period, as follows:

<b>Name of Professional Individual</b>	<b>Position of the Applicant, Year of Obtaining License to Practice, Year of Joining the Firm</b>	<b>Department</b>	<b>Hourly Billing Rate</b>	<b>Total Interim Hours Billed</b>	<b>Total Interim Compensation</b>
Claude D. Montgomery	Partner - Admitted to the Bar in 1984; Joined the Firm in 2002	Restructuring Insolvency & Bankruptcy Litigation	\$1,210	171	\$206,910.00
Lynn P. Harrison, III	Partner - Admitted to the Bar in 1984; Joined the Firm in 2020	Restructuring Insolvency & Bankruptcy Litigation	\$1,140	98.60	\$112,404.00
Philip A. O'Connell, Jr.	Partner - Admitted to the Bar in 1983; Joined the Firm in 1983	Commercial Litigation	\$1,105	0.30	\$331.50
Jeffrey J. Murphy	Partner - Admitted to the Bar in 1984; Joined the Firm in 1985	Capital Markets	\$1,045	24.10	\$25,184.50
E. Lee Smith	Partner - Admitted to the Bar in 1986; Joined the Firm in 2003	Capital Markets	\$1,025	158.30	\$162,257.50
Drew Marrocco	Partner - Admitted to the Bar in 1985; Joined the Firm in 1995	Commercial Litigation	\$1,020	3.80	\$3,876.00
Sam J. Alberts	Partner - Admitted to the Bar in 1993; Joined the Firm in 2011	Restructuring Insolvency & Bankruptcy Litigation	\$990	102.40	\$101,376.00
Sandra McCandless	Partner - Admitted to the Bar in 1973; Joined the Firm in 1994	Employment & Labor	\$985	64.80	\$63,828.00
Samuel R. Maizel	Partner - Admitted to the Bar in 1985; Joined the Firm in 2015	Restructuring Insolvency & Bankruptcy Litigation	\$970	117	\$113,490.00
Robert E. Richards	Partner - Admitted to the Bar in 1988; Joined the Firm in 1988	Restructuring Insolvency & Bankruptcy Litigation	\$940	4.40	\$4,136.00
Roger K. Heidenreich	Partner - Admitted to the Bar in 1983; Joined the Firm in 1983	Commercial Litigation	\$930	5.70	\$5,301.00
Nicole Mersky	Partner - Admitted to the Bar in 2001; Joined the Firm in 2021	Capital Markets	\$895	1.30	\$1,163.50
Christopher D. O'Leary	Partner - Admitted to the Bar in 2009; Joined the Firm in 2014	Capital Markets	\$850	150.30	\$127,755.00

<b>Name of Professional Individual</b>	<b>Position of the Applicant, Year of Obtaining License to Practice, Year of Joining the Firm</b>	<b>Department</b>	<b>Hourly Billing Rate</b>	<b>Total Interim Hours Billed</b>	<b>Total Interim Compensation</b>
Tania M. Moyron	Partner - Admitted to the Bar in 2005; Joined the Firm in 2017	Restructuring Insolvency & Bankruptcy Litigation	\$790	314.80	\$248,692.00
Geoffrey M. Miller	Partner - Admitted to the Bar in 2012; Joined the Firm in 2014	Restructuring Insolvency & Bankruptcy Litigation	\$770	45.10	\$34,727.00
Lauren M. Macksoud	Partner - Admitted to the Bar in 2003; Joined the Firm in 2017	Restructuring Insolvency & Bankruptcy Litigation	\$770	144.20	\$111,034.00
Casey W. Doherty, Jr.	Senior Managing Associate - Admitted to the Bar in 2011; Joined the Firm in 2021	Restructuring Insolvency & Bankruptcy Litigation	\$695	87.90	\$61,090.50
Malka S. Zeefe	Counsel - Admitted to the Bar in 2005; Joined the Firm in 2017	Restructuring Insolvency & Bankruptcy Litigation	\$690	7.10	\$4,899.00
Andrew M. Pendexter	Senior Managing Associate - Admitted to the Bar in 2011; Joined the Firm in 2021	Capital Markets	\$680	1.00	\$680.00
Jeffrey C. Nelson	Managing Associate - Admitted to the Bar in 2017; Joined the Firm in 2017	Capital Markets	\$680	6.20	\$4,216.00
Sarah M. .Schrag	Managing Associate - Admitted to the Bar in 2016; Joined the Firm in 2016	Restructuring Insolvency & Bankruptcy Litigation	\$650	120.70	\$78,455.00
David F. Cook	Managing Associate - Admitted to the Bar in 2017; Joined the Firm in 2019	Bankruptcy	\$620	151.90	\$94,178.00
Jessica Peterson	Associate - Admitted to the Bar in 2019; Joined the Firm in 2022	Employment & Labor	\$525	0.90	\$472.50
George L. Medina	Senior Paralegal	Restructuring Insolvency & Bankruptcy Litigation	\$360	23.60	\$8,496.00
Elizabeth S. Cobarrubias	Senior Research Specialist	Knowledge/Practice Innovation	\$350	0.50	\$175.00
Kathryn Howard	Senior Paralegal	Restructuring Insolvency & Bankruptcy Litigation	\$340	17.70	\$6,018.00
Jack I. Milko	Paralegal	Capital Markets	\$320	0.30	\$96.00
Timothy M. Fowler	Supervisor, Senior Research Specialist	Knowledge/Practice Innovation	\$265	0.40	\$106.00

**Grand Total: \$1,581,348.00**  
**Total Hours 1,824.30**  
**Blended Rate: \$866.82**

34. The nature of work performed by these persons is fully set forth in Exhibit A attached hereto. These are DUS's normal hourly rates for work of this character. The reasonable value of the services rendered by DUS for the Debtors during the Interim Period is \$1,581,348.00.

35. In accordance with the factors enumerated in section 330 of the Bankruptcy Code, it is respectfully submitted that the amount requested by DUS is fair and reasonable given (a) the complexity of the case, (b) the time expended, (c) the nature and extent of the services rendered, (d) the value of such services, and (e) the costs of comparable services other than in a case under the Bankruptcy Code. Moreover, DUS has reviewed the requirements of Del. Bankr. LR 2016-2 and the Administrative Order and believes that this Application complies with such Rule and Order.

WHEREFORE, DUS respectfully requests that the Court enter an order providing that, for the period of June 30, 2022, through July 31, 2022, an interim allowance be made to DUS for compensation in the amount of \$1,581,348.00 and actual and necessary expenses in the amount of \$3,915.98 for a total allowance of \$1,585,263.98 and payment of \$1,265,078.40 (80% of the allowed fees) and reimbursement of \$3,915.98 (100% of the allowed expenses) be authorized for a total payment of \$1,268,994.38; and for such other and further relief as this Court deems proper.

Dated: October 14, 2022  
Wilmington, Delaware

**PACHULSKI STANG ZIEHL & JONES LLP**

/s/ Mary F. Caloway

Laura Davis Jones (DE Bar No. 2436)

Timothy P. Cairns (DE Bar No. 4228)

Mary F. Caloway (DE Bar No. 3059)

919 North Market Street, 17th Floor

P.O. Box 8705

Wilmington, Delaware 19899 (Courier 19801)

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Fax: (302) 652-4400

Email: [ljones@pszjlaw.com](mailto:ljones@pszjlaw.com)

[tcairns@pszjlaw.com](mailto:tcairns@pszjlaw.com)

-and-

Samuel R. Maizel (admitted *pro hac vice*)  
Tania M. Moyron (admitted *pro hac vice*)

**DENTONS US LLP**

601 S. Figueroa Street #2500

Los Angeles, CA 90017

Telephone: (213) 623-9300

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Lauren Macksoud (admitted *pro hac vice*)

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Email: [david.f.cook@dentons.com](mailto:david.f.cook@dentons.com)

*Counsel for Debtors and Debtors in Possession*

**DECLARATION**

STATE OF CALIFORNIA            )  
                                                  ) ss.  
COUNTY OF LOS ANGELES    )

I, Samuel M. Maizel, hereby certify as follows:

1. I am a partner in the applicant firm, Dentons US LLP (“DUS”), and have been admitted to appear before this Court *pro hac vice*.

2. I have personally performed many of the legal services rendered by Dentons, as counsel for the Debtors, and am thoroughly familiar with all other work performed on behalf of the Debtors by the lawyers and paraprofessionals in the firm.

3. The facts set forth in the foregoing Application are true and correct to the best of my knowledge, information, and belief. Moreover, I have reviewed the requirements of Rule 2016-2 of the Local Rules of Practice and Procedure of the United States Bankruptcy Court for the District of Delaware and submit that the Application complies with such requirements.

Dated: October 14, 2022

/s/ Samuel M. Maizel  
/s/ Samuel M. Maizel

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FIRST GUARANTY MORTGAGE  
CORPORATION, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-10584 (CTG)

(Jointly Administered)

**Objection Deadline: November 7, 2022, at 4:00  
p.m. (prevailing Eastern Time)**

**NOTICE OF FILING FEE APPLICATION**

**PLEASE TAKE NOTICE** that Dentons US LLP (“DUS”), counsel to the debtors and debtors in possession (the “Debtors”), in the above-captioned cases, has filed its *First Monthly Application for Compensation and Reimbursement of Expenses of Dentons US LLP, as Counsel to the Debtors’ for the Period from June 30, 2022 through July 31, 2022* (the “Application”) seeking fees in the amount of \$1,581,348.00 and reimbursement of actual and necessary expenses in the amount of \$3,915.98 for the period from June 30, 2022 through July 31, 2022.

**PLEASE TAKE FURTHER NOTICE** that any objection or response to the Application must be made in writing and be filed with the United States Bankruptcy Court for the District of Delaware (the “Bankruptcy Court”), 824 N. Market Street, 3rd Floor, Wilmington, Delaware 19801, on or before **November 7, 2022, at 4:00 p.m. prevailing Eastern Time.**

**PLEASE TAKE FURTHER NOTICE** that at the same time, you must also serve a copy of the response or objection upon: (i) counsel for the Debtors: (a) Dentons US LLP, 601 S. Figueroa Street, #2500, Los Angeles, CA 90017 (Attn: Tania M. Moyron,

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<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s tax identification number, are: First Guaranty Mortgage Corporation (9575); and Maverick II Holdings, LLC (5621). The location of the corporate headquarters and the service address for First Guaranty Mortgage Corporation is 5800 Tennyson Parkway, Suite 450, Plano, TX 75024.

tania.moyron@dentons.com and Samuel Maizel, samuel.maizel@dentons.com) and (b) Pachulski Stang Ziehl & Jones LLP, 919 North Market Street, 17th Floor, Wilmington, Delaware 19801 (Attn: Laura Davis Jones, ljones@pszjlaw.com ); (ii) Barclays Bank PLC: Hunton Andrews Kurth LLP, 200 Park Avenue, New York, NY 10166 (Attn: Peter S. Partee, ppartee@huntonak.com) and (Brian M. Clarke, brianclarke@huntonak.com); and Potter Anderson & Corroon LLP, 1313 N. Market Street, 6th Floor, Wilmington, Delaware, 19801 (Attn. Jeremy W Ryan, jryan@potteranderson.com); (iii) counsel to LVS II SPE XXXIV LLC, Greenberg Traurig, LLP., (Attn: Nancy Peterman, PetermanN@gtlaw.com), (John D. Elrod, ElrodJ@gtlaw.com), (Joseph Davis DavisJ@gtlaw.com), and (Danny Duerdoth, duerdothD@gtlaw.com); (iv) the Office of the United States Trustee, 844 King Street, Suite 2207 Lockbox 35, Wilmington, DE 19801, (Attn: Benjamin Hackman benjamim.a.hackman@usdoj.gov); and (v) counsel for the Official Committee of Unsecured Creditors, (a) Thompson Coburn Hahn & Hessen LLP, 488 Madison Avenue, New York, NY 10022 (Attn: Mark S. Indelicato mindelicato@thompsoncoburn.com), (Mark T. Power mpower@thompsoncoburn.com) and (Joseph Orbach jorbach@thompsoncoburn.com); and (b) Blank Rome LLP, 1201 Market Street, Suite 800, Wilmington, DE 19801 (Attn: Regina Stango Kelbon, regina.kelbon@blankrome.com), (Victoria A. Guilfoyle, tori.guilfoyle@blankrome.com) and (Lorenzo R. Thomas III, Lorenzo.thomas@blankrome.com).

**PLEASE TAKE FURTHER NOTICE** that on August 2, 2022, the Bankruptcy Court entered the *Order (I) Approving Procedures for (A) Interim Compensation and Reimbursement of Expenses of Retained Professionals* (the “Order”) [Docket No. 268].

Pursuant to the Order, in the absence of timely filed objections or responses, and upon the filing with the Bankruptcy Court of a certification of no objection, the Debtors are authorized to

pay the professionals eighty percent (80%) of the fees, and one hundred percent (100%) of expenses without further notice or hearing. All fees and expenses paid to the professionals are subject to final approval by the Court.

**PLEASE TAKE FURTHER NOTICE THAT IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE APPLICATION WITHOUT FURTHER NOTICE OR HEARING.**

Dated: October 17, 2022  
Wilmington, Delaware

**PACHULSKI STANG ZIEHL & JONES LLP**

/s/ Mary F. Caloway

Laura Davis Jones (DE Bar No. 2436)  
Timothy P. Cairns (DE Bar No. 4228)  
Mary F. Caloway (DE Bar No. 3059)  
919 North Market Street, 17th Floor  
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Fax: (302) 652-4400  
Email: [ljones@pszjlaw.com](mailto:ljones@pszjlaw.com)  
[tcairns@pszjlaw.com](mailto:tcairns@pszjlaw.com)

-and-

Samuel R. Maizel (admitted *pro hac vice*)  
Tania M. Moyron (admitted *pro hac vice*)  
**DENTONS US LLP**  
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Lauren Macksoud (admitted *pro hac vice*)  
Claude D. Montgomery (admitted *pro hac vice*)  
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[claudemontgomery@dentons.com](mailto:claudemontgomery@dentons.com)

David F. Cook (DE Bar No. 6352)  
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1900 K Street, NW  
Washington, DC 20006  
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Email: [david.f.cook@dentons.com](mailto:david.f.cook@dentons.com)

*Counsel for Debtors and Debtors in Possession*

**EXHIBIT A**

Fees

First Guaranty Mortgage Corporation  
 Attn: Aaron Samples  
 5800 Tennyson Parkway, Suite 450  
 Plano TX 75024  
 United States

August 31, 2022

**Invoice No. 2553500**

Client: 15810756

Payment Due Upon Receipt

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Total This Invoice	\$ 1,585,263.98
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Please return this page with your payment

In the case of mail deliveries to:

SNR Denton US LLP  
 8000 Sears Tower  
 Chicago, IL 60606

OR

In the case of overnight deliveries to:

SNR Denton US LLP  
 Attention: Accounting  
 233 South Wacker Drive  
 Chicago, IL 60604-6404

Payment by wire transfer/ACH should be sent to:

Citi Private Bank  
 227 W Monroe, Chicago, IL 60606  
 ABA Transit # 271070801  
 Account # 0801051693  
 Account Name: Dentons US LLP  
 Swift Code: CITIUS33

Reference Invoice # and/or client matter #

All payments must be in U.S. Dollars - Federal Tax I.D. Number 36-1796730

Questions relating to this invoice should be directed to:

S. Maizel  
 at 1 213 623 9300



First Guaranty Mortgage Corporation  
Attn: Aaron Samples  
5800 Tennyson Parkway, Suite 450  
Plano TX 75024  
United States

August 31, 2022

**Invoice No. 2553500**

For Professional Services Rendered through July 31, 2022:

Matter: 15810756-000003  
First Guaranty Mortgage Corporation

B110 - Case Administration

Date	Timekeeper	Hours	Amount	Task	Narrative
06/30/22	T. Moyron	3.40	2,686.00	B110	Correspond with Board and attend Board meeting re amended budget and risks (.6); analyze and prepare first-day declaration, correspond regarding First-Day Motions and Declaration and analyze same (2.8).
06/30/22	G. Miller	0.50	385.00	B110	Finalize insurance motion.
06/30/22	G. Miller	1.30	1,001.00	B110	Finalize critical vendor motion.
06/30/22	G. Miller	0.60	462.00	B110	Review vendor contracts.
06/30/22	G. Miller	1.60	1,232.00	B110	Review United States Trustee and Liberty Mutual proposed revisions to proposed orders approving insurance motion and critical vendor motion.
06/30/22	G. Miller	1.10	847.00	B110	Prepare for first day hearing.
06/30/22	G. Miller	0.20	154.00	B110	Call with Dentons and Pachulski re United States Trustee's comments to first day motions.
06/30/22	T. Moyron	3.40	2,686.00	B110	Calls and correspondence with PSZJ regarding First-Day Motions, hearing, and related issues (3.4).
06/30/22	S. Alberts	1.70	1,683.00	B110	Review final first day papers and prepare for first day hearing (1.3), communications with potential consultant (.4).
06/30/22	J. Murphy	4.40	4,598.00	B110	Review draft motions and orders and related emails and comment on same.
06/30/22	S. Schrag	4.40	2,860.00	B110	Review and revise Motion to Reject/Abandon (.7); conduct further research in support thereof (2.1); strategy session with L. Harrison regarding Motion to Reject/Abandon (1.6).

First Guaranty Mortgage Corporation  
Matter: 15810756-000003  
Invoice No.: 2553500

August 31, 2022

Date	Timekeeper	Hours	Amount	Task	Narrative
06/30/22	M. Zeefe	2.20	1,518.00	B110	Review and circulate final comments to first day declaration (1.6); call with C. Doherty re same (0.1); call with M. Caloway re same (0.2); counsel call re hearing preparation (0.3).
06/30/22	G. Medina	4.80	1,728.00	B110	Received and review critical vendor motion from G. Miller (0.3); correspond with G. Miller regarding motions and further assistance (0.2); received request from Mary Ann FTI and send top 30 creditors (0.2); received and reviewed notice parties from M. Zeefe related to utilities motion (0.1); correspond with Mary Ann (FTI) regarding 30 Largest and 25M creditor and send work version of 30 largest (0.2); correspond with McKay Jacobson (FTI) and Mary Ann regarding new excel Spreadsheet to included new 25M creditor (0.2); reviewed and revised list of Top 30 creditors and send to FTI (0.5); review emails sent by S. Maizel regarding Lenders counsel and correspond with M. Zeefe regarding Utilities motions (0.2); work on edits to the Utilities Motion to include Lenders Counsel information (0.5); correspond with L. Macksoud regarding DIP Motions (0.2); reviewed updated utilities motions and prepared and assembled and separated Proposed Interim and Final Orders and send to M. Zeefe (0.4); further correspond with L. Macksoud regarding Dip Motion status (0.1); review revised format for Utilities notice parties for Lenders and revised (0.5); further correspond with M. Zeefe regarding Wind-down language and removed to reflect the work Restructuring (0.1); correspond with M. Zeefe regarding finalizing utilities motion (0.2); received prepared and assembled Cash Management Motion and correspond with A. Helman regarding format and exhibits (0.6); call with T. Moyron regarding first day motions (0.1); Call with Mary Ann (FTI) regarding First day motions (0.2).

First Guaranty Mortgage Corporation  
Matter: 15810756-000003  
Invoice No.: 2553500

August 31, 2022

Date	Timekeeper	Hours	Amount	Task	Narrative
06/30/22	G. Medina	4.30	1,548.00	B110	<p>Correspond with S. Alberts regarding utilities motion and footnote on credit Cards (0.2); call from G. Miller regarding Sam Alberts questions regarding footnote on Credit Card (0.1); Correspond with Mary Ann (FTI) regarding Wage motion (0.1); correspond with S. Alberts regarding wage motion and send word version for his review (0.2); call with M. Zeefe regarding finalizing wage motion (0.1); Review and send Final First Day Motions T. Cairns, L.D.Jones, M. Caloway, M. Litvak, T. Moyron, S. Maizel, M. Zeefe and M.A. Kaptain (0.3); revised and send updated First Day Motions to Marry Ann (FTI), T. Moyron and S. Maizel (0.4); correspond and transmit wage motion with Exhibits to . Cairns, L.D.Jones, M. Caloway, M. Litvak, T. Moyron, S. Maizel, M. Zeefe and M.A. Kaptain (0.2). received request from Mary Ann(FTI) to send finalized first day motions (0.2); correspond with T. Moyron regarding transmitting of ZIP Filed with First Day Motions (0.2); Correspond with M. Zeefe regarding First Day Declaration (0.2); correspond with M. Zeefe regarding transmission of First Days with the DIP Motions not finalized (0.2); review request from T. Moyron and M. Caloway to register all DUS attorneys in attendance for First Day Hearings (0.1); register all DUS attorneys through Delaware E-Appearence portal (0.5); Received request from T. Carne regarding Notice of Notice of Submission of Outdated Official Forms (0.1); Correspond with T. Moyron regarding First Day Motions sent to PSZJ (0.1); correspond with T. Moyron regarding Finalizing DIP Motions (0.1); received and Review Interim Repo Order with Exhibits and saved (0.3); Call with C. Montgomery Report DIP Motions and Interim REPO Order (0.3); received and review Final DIP Motion and Correspond with C. Montgomery Regarding Draft Stamp (0.3); Correspond with Shannon Daily regarding revised MRA (0.1).</p>

First Guaranty Mortgage Corporation  
Matter: 15810756-000003  
Invoice No.: 2553500

August 31, 2022

Date	Timekeeper	Hours	Amount	Task	Narrative
06/30/22	G. Medina	4.40	1,584.00	B110	Reviewed and revised DIP Motion, Interim Repo Order and DIP MRA and transmit to T. Moyron per her request (0.4); Download and send First Day Motion to D. Kalve per the request of T. Moyron for preparation of hearing binder (0.7); Transmit Zip File of First Day Motions to D. Kalve (0.2); Call to LA Facilities regarding Copy of First Day Binder of all First Day Pleadings filed for T. Moyron (0.2); Draft Index of First Day Pleadings and Cover Binder and send to LA Facilities (0.5); Retrieve and send per the request of T. Moyron all First Day Motions with Notices of hearing to L. Smith and Register L. Smith to appear for hearing (0.3); Received request to send t. Carnes Word versions of all First Day Motions (0.1); began collection of all First Day Motions (0.5); Correspond with D. Cook regarding KCC Retention Motion in Word (0.2); work on preparation and transmitting Zip folders of all Final First Day Motions in PDF and Word to PZSJ (0.4); Send list of all DUS Attendees for First day hearing to S. Schrag per her request (0.3); register D. Cook for first day hearing per the request S. Schrag and send confirmation to D. Cook, S. Schrag and T. Moyron (0.3); Correspond with LD. Jones regarding FTI Attendance and sign up Mary Ann (FTI) for hearing to appear at First Day hearing (0.3).
06/30/22	S. Maizel	1.00	970.00	B110	Review and respond to emails preparation for first day hearing.
06/30/22	S. Maizel	1.00	970.00	B110	Review and respond to emails re issues related to borrowing for operational cash flow.
06/30/22	C. O'Leary	1.20	1,020.00	B110	Plan/prepare for/conduct Telephone Conference Reed Smith, Freddie's counsel, re: first day hearings (0.4); review/analyze docket notices (0.8).
06/30/22	J. Murphy	4.20	4,389.00	B110	Innumerable conference calls with client (including D. Oien) and opposing counsel (including S. Dailey of Hunton).

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06/30/22	L. Macksoud	3.00	2,310.00	B110	Calls and emails in preparation for bankruptcy filing, review, draft and revise documents in preparation for same, preparation for first day hearing.
06/30/22	E. Smith	9.10	9,327.50	B110	Attended calls with DIP lender counsel regarding DIP facility term sheet revisions (1.4); reviewed revised DIP MRA (1.4); confer with counsel for DIP lenders, colleagues and FTI regarding first day orders and first day declarations (1.3); reviewed revised pricing side letter and comments on CEO first day declaration; attended catch up call with the Board (1.6); confer with Andrew Helman regarding cash management motion (0.2); confer with T. Moyron, C. O'Leary and counsel for Freddie Mac regarding background to filing, servicer assurances of performance, putback claims and issues that have arisen in other mortgage originator bankruptcies (0.7); reviewed cash flow DIP loan agreement (1.1); confer with T. Moyron and counsel for Flagstar regarding cash collateral adequate protection for Flagstar (0.5); confer with T. Moyron and L. Macksoud regarding prep for DIP financing motion at first day hearing (0.9).
07/01/22	C. O'Leary	7.20	6,120.00	B110	Plan/prepare for/conduct Telephone Conference FTI and FGMC re: first day motions and exchange correspondence re: the same (1.2); plan/prepare for/ attend first day hearing in Delaware Bankruptcy Court (5.2); review/analyze objections to first day motions and exchange correspondence re: the same (0.8).
07/01/22	S. Maizel	0.30	291.00	B110	Telephone conference with T. Moyron re pending issues.
07/01/22	S. Maizel	0.70	679.00	B110	Telephone conference with FTI, A. Samples, etc. pending issues.
07/01/22	G. Miller	1.40	1,078.00	B110	Review insurance motion and critical vendor motion and related exhibits in preparation for first day hearing.
07/01/22	G. Miller	0.60	462.00	B110	Call with B. Bains re revisions to proposed order approving insurance motion (.3); emails with T. Moyron re same (.3).

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07/01/22	G. Miller	2.20	1,694.00	B110	Attend first day hearing.
07/01/22	G. Miller	0.20	154.00	B110	Further revise proposed order approving insurance motion.
07/01/22	C. Doherty, Jr.	3.50	2,432.50	B110	Attend First Day Hearings.
07/01/22	S. Maizel	10.70	10,379.00	B110	Prepare for first day hearing (5.0); participate in first day hearing (5.7).
07/01/22	S. Maizel	0.60	582.00	B110	Telephone conference with Ginnie Mae, US Department of Justice, D. Oien, Buckley attorneys re issues related to continued participation in Ginnie Mae programs.
07/01/22	T. Moyron	0.20	158.00	B110	Correspond with FTI, L. Jones, et al., re UST questions.
07/01/22	G. Medina	0.40	144.00	B110	Retrieve and send at the request of S. Maizel the First Day and DIP declaration in preparation for hearing.
07/01/22	S. Schrag	3.10	2,015.00	B110	Confer with Dentons team regarding protocols for hearing (.2); confer with S. Alberts regarding the same (.1); confer with C. O'Leary regarding hearing (.1); attend first day hearing (2.5); confer with L. Harrison regarding First Day Hearings (.2).
07/01/22	M. Zeefe	2.70	1,863.00	B110	Prepare for hearing on utilities motion (0.4); attend hearing on all first day motions (2.2); emails re communications (0.1).
07/01/22	L. Macksoud	10.40	8,008.00	B110	Prepare for (3.5) and participate in first day hearing (6.0), follow up calls and emails with company and lenders to finalize financing orders and transaction documents and close financing arrangements (1.1).
07/01/22	S. Schrag	0.40	260.00	B110	Confer with T. Moyron, S. Maizel, and A. Aguilar regarding UST protocols for case.
07/01/22	S. Schrag	0.80	520.00	B110	Revise task tracker (.4); confer with T. Moyron regarding the same (.2); confer with T. Moyron regarding deliverables to client re second day motions and beyond (.2).
07/01/22	T. Moyron	5.70	4,503.00	B110	Participate in First-Day hearings and participate in calls with counsel for counterparties, GT, et. al., during recess to reach agreement on DIP and Repo orders.
07/01/22	T. Moyron	0.10	79.00	B110	Call with A. Samples re labor matters.

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07/01/22	T. Moyron	0.10	79.00	B110	Prepare response to L. Jones re IDI.
07/01/22	T. Moyron	0.50	395.00	B110	Correspond with A. Helman regarding accounts (.2); zoom meeting with FTI, A. Helman, et al., re same (.3).
07/02/22	G. Medina	0.40	144.00	B110	Received request from T. Moyron and retrieve and send list of 30 largest creditors filed to L. Smith and J. Murphy.
07/05/22	T. Moyron	0.30	237.00	B110	Call with S. Maizel regarding pending issues.
07/05/22	T. Moyron	0.20	158.00	B110	Correspond with T. Meerovich, et al., re IDI.
07/05/22	T. Moyron	0.30	237.00	B110	Correspond with C. O'Leary re articles of incorporation and analysis of related issues.
07/05/22	T. Moyron	0.20	158.00	B110	Analyze T. Cairns, et al., emails re MOR, IDI, etc.
07/05/22	T. Moyron	1.20	948.00	B110	Teams meeting with FTI, L. Jones, Dentons re pending issues, including sales, refinancing of loans, KERP/KEIP, and other bankruptcy related documents and matters.
07/05/22	S. Alberts	0.80	792.00	B110	Review First Day hearing transcript, provide suggested corrections for errata submission.
07/05/22	E. Smith	1.40	1,435.00	B110	Attended recap call with T. Myron, S. Maizel and other Dentons colleagues, L. Jones, Pachulski, and T. Meerovich and J. Krasne, FTI to review July 5th issues and solutions, and planning for issues in lending, staffing, bankruptcy case administration and loan sale work streams.
07/05/22	S. Maizel	1.30	1,261.00	B110	Zoom call with PSZJ, etc. re pending issues, including funding, demands from warehouse lenders, etc.
07/05/22	S. Maizel	0.30	291.00	B110	Zoom call with T. Moyron re pending issues.
07/05/22	M. Zeefe	0.10	69.00	B110	Emails re media coverage updates.
07/05/22	S. Schrag	0.20	130.00	B110	Review media coverage material.

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07/06/22	S. Schrag	1.00	650.00	B110	Confer with T. Moyron regarding outstanding tasks, including notices of bankruptcy, leases, loan letters, employment applications, and WARN act litigation (.3); revise list of goals and objectives (.1); correspond with T. Moyron, S. Maizel, D. Oien, J. John, and J. Krasne regarding reoccurring conference and outstanding issues (.3); revise list of deadlines re goals, filings, and objectives (.3).
07/06/22	S. Maizel	0.80	776.00	B110	Zoom call with A. Samples, D. Oien, FTI, etc. re gender discrimination lawsuit public response (.5); review and respond to emails re public statement re same (.3).
07/06/22	S. Maizel	0.50	485.00	B110	Zoom call with A. Helman, L. Smith, etc. re Bailee letters examplars, DB issues, etc.
07/06/22	M. Zeefe	0.30	207.00	B110	Discussion with T. Moyron and emails with Company and FTI re litigation-related press release.
07/06/22	L. Macksoud	4.10	3,157.00	B110	Call with TCB re portfolio transaction (.8), follow up call with working group re same and re issues relating to bailee letters (.6), call with A. Helman re same and re communication with counsel to DB (.5), call with Dentons working group re JBV issues (.5), call with Dentons and FTI re list of open issues and sale process strategies (1.7).
07/06/22	S. Maizel	0.40	388.00	B110	Zoom call with FTI, etc. re preparation of schedules and SOFA.
07/06/22	T. Moyron	0.20	158.00	B110	Call with S. Maizel re pending issues.
07/06/22	T. Moyron	0.70	553.00	B110	Conference call with D. Oien, et al., regarding vendor, lease, and other issues (.5), and related emails from D. Oien, et al., re same (.2).
07/06/22	T. Moyron	0.50	395.00	B110	Zoom meeting with FTI, PSZJ, KCC, and Company regarding schedules and SOFA.
07/06/22	G. Medina	0.50	180.00	B110	Status call with KCC, FTI, Dentons and PSZJ regarding preparation of SOFA and SOAL.

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07/06/22	C. Montgomery	0.80	968.00	B110	Phone call with T. Moyron regarding team organization (.3); zoom call Dentons, FTI, A Samples regarding case update (.5).
07/07/22	G. Medina	0.60	216.00	B110	Review docket per the request of T. Moyron and download/send all First Day Orders entered to T. Moyron and S. Maizel.
07/07/22	C. Montgomery	0.30	363.00	B110	FTI and Dentons catch up call with T. Moyron and T. Meerovich (.3).
07/07/22	D. Cook	0.20	124.00	B110	Email communication with T Moyron regarding top 30 creditors (.1); telephone conference with T Moyron regarding same (.1).
07/07/22	S. Maizel	0.90	873.00	B110	Preparation of and participation in t/c with GNMA representatives, FTI, etc. re loan issues. (.5); review and respond to emails re pending requests for information (.4).
07/07/22	S. Maizel	0.30	291.00	B110	Telephone conference with FTI, etc. re TCB issues.
07/07/22	S. Maizel	1.00	970.00	B110	Telephone conference with FTI, GT, etc., re pending issues.
07/07/22	S. Maizel	0.40	388.00	B110	Telephone conference with K. Zinman re TCB issues.
07/07/22	S. Maizel	0.50	485.00	B110	Telephone conference re Customers issues with FTI, etc.
07/07/22	S. Maizel	1.00	970.00	B110	Telephone conference with A. Samples re GSEs issues, etc.
07/07/22	G. Miller	0.10	77.00	B110	Call with A. Helman re use of credit cards postpetition.
07/07/22	T. Moyron	1.10	869.00	B110	Conference call with FTI, PIMCO/BRAVO, Greenberg re sale alternatives.
07/07/22	T. Moyron	0.20	158.00	B110	Analyze correspondence from J. John, et al., re TCB account and deposit.
07/07/22	T. Moyron	0.20	158.00	B110	Analyze emails from T. Meerovich, et al., re FNMA MBS Fees.
07/07/22	T. Moyron	0.30	237.00	B110	Teams meeting with FTI and Dentons re status and pending issues discussion.
07/07/22	T. Moyron	0.40	316.00	B110	Call with L. Jones re IDI and related matters (.2); correspond with L. Jones, T. Meerovich re UST meetings (.2).

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Date	Timekeeper	Hours	Amount	Task	Narrative
07/07/22	S. Alberts	0.10	99.00	B110	Communications about staffing.
07/07/22	E. Smith	1.20	1,230.00	B110	Attended catch up call with FGMC, A. Samples and D. Oien, FTI, T. Meerovitch, and Dentons, T. Myron, and teams regarding loan sale work streams.
07/07/22	E. Smith	0.70	717.50	B110	Confer with Dentons team, T. Myron and others, and Pachulski team, L. Jones and team, regarding facilitation repo liquidations and terminations.
07/07/22	T. Moyron	0.40	316.00	B110	Correspond with S. Schrag re OCP (.3); Correspond with D. Cook re Top 30 creditors (.1).
07/08/22	S. Maizel	0.80	776.00	B110	Telephone conference with Freddie Mac representatives, etc. re pending loan.
07/08/22	S. Maizel	1.40	1,358.00	B110	Telephone conference with PIMCO representatives re pending issues.
07/08/22	S. Maizel	0.50	485.00	B110	Telephone conference with US DOJ attorneys re pending issues.
07/08/22	S. Schrag	0.90	585.00	B110	Revise goals and objectives list (.6); review notice from Deutsche Bank in support of the same (.1); confer with T. Moyron regarding the same (.1); confer with T. Moyron regarding call with Pachulski team to discuss outstanding milestones (.1).
07/08/22	S. Maizel	0.80	776.00	B110	Telephone conference with GNMA/FHA, US DOJ, etc. re pending issues.
07/08/22	L. Harrison	1.50	1,710.00	B110	Attend to review of docket regarding most recent developments in anticipation of internal meeting and upcoming calendar events (1.50).
07/08/22	C. Montgomery	0.10	121.00	B110	Review company financial statements (.1).
07/08/22	T. Moyron	0.20	158.00	B110	Conference call with M. Schwarzmann re status and next steps.
07/10/22	S. Alberts	0.20	198.00	B110	Staffing issues and communications.
07/11/22	G. Medina	0.20	72.00	B110	Correspond with S. Schrag regarding preparation of notices of bankruptcy in each case where the Debtor(s) are defendants.
07/11/22	T. Moyron	0.60	474.00	B110	Call with N. Peterman regarding various pending issues, including sale of pipeline, GSEs status, and next steps.

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07/11/22	T. Moyron	0.30	237.00	B110	Meeting with L. Jones, W. Nolan, et al. re preparation for meeting with IDI.
07/11/22	T. Moyron	1.00	790.00	B110	Meeting with S. Schrag and L. Smith regarding pending matters, including mechanics of DIP repayment, pipeline open issues and other matters.
07/11/22	T. Moyron	0.50	395.00	B110	Meeting with Company, FTI and S. Schrag re litigation and IDI.
07/11/22	T. Moyron	1.20	948.00	B110	Analyze Top 30 and meeting with Company and FTI regarding same including relationships and amounts owed.
07/11/22	T. Moyron	0.70	553.00	B110	Meeting with UST, L. Jones, and FTI regarding forms submitted to UST and related matters.
07/11/22	T. Moyron	0.30	237.00	B110	Meeting with L. Jones, et al., in anticipation of upcoming call with UST.
07/11/22	T. Moyron	0.90	711.00	B110	Analyze emails from T. Ramm, et al., regarding GSE/GNMA Securities & TCB request and prepare emails regarding same (.3); meeting with Dentons regarding same and advice to Company (.6).
07/11/22	T. Moyron	0.70	553.00	B110	Meeting with representatives of DIP Cash Flow Lender FTI, Greenberg, et al., regarding pipeline, plan, and other matters.
07/11/22	T. Moyron	0.40	316.00	B110	Call with A. Samples regarding KERP/KEIP, discussions regarding potential exit and open questions related to DIP lender.
07/11/22	T. Moyron	0.50	395.00	B110	Meeting with FTI, Company, and Dentons re KEIP/KERP.
07/11/22	S. Schrag	1.70	1,105.00	B110	Review and revise goals and objectives (1.5); confer with T. Moyron regarding the same (.2).
07/11/22	S. Schrag	0.70	455.00	B110	Call with L. Davis Jones, W. Nolan, T. Cairns, and T. Moyron regarding upcoming call with USTrustee regarding Official Committee of Unsecured Creditors (.3); participate in call with UST and take notes regarding the same (.4).

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07/11/22	C. Montgomery	1.20	1,452.00	B110	Phone calls T. Moyron re case developments (.5); zoom call with L. D Jones and T. Meerovich regarding prep session for UST IDI (.7).
07/11/22	T. Moyron	0.40	316.00	B110	Call with M. Schwarzmenn re pipeline, matters related to potential plan, and other case issues.
07/11/22	E. Smith	1.00	1,025.00	B110	Confer with US Trustee, T. Myron and L. Davis Jones regarding expressions of creditor Interest in serving on creditors' committee; attended follow up call with T. Moyron and L. Davis Jones.
07/11/22	L. Macksoud	0.50	385.00	B110	Confer with counsel to subservicer re open issues.
07/11/22	J. Murphy	1.20	1,254.00	B110	Numerous emails re TCB claims and Paul Weiss arguments.
07/11/22	T. Moyron	0.20	158.00	B110	Correspond with R. Chesley re notice of commencement (.1) and review same (.1).
07/12/22	J. Murphy	2.20	2,299.00	B110	Email C. Montgomery and team re whole loan pricing/settlement and Fannie guaranty fees and review Fannie guides for same; and email team re agency deliveries and gestation periods.
07/12/22	C. Montgomery	0.30	363.00	B110	Review notices of hearing re final orders.
07/12/22	C. Montgomery	1.80	2,178.00	B110	Dentons, FTI MS Teams call regarding outstanding case tasks including T. Meerovich and T. Moyron.
07/12/22	G. Miller	0.90	693.00	B110	Call with Dentons, FTI and FGMC re filing supplement to critical vendor motion (.7); Follow up with T. Cairnes and L. Davis Jones re same (.2).
07/12/22	G. Miller	1.80	1,386.00	B110	Call with FTI and Dentons re status of workstreams.
07/12/22	T. Moyron	0.50	395.00	B110	Call with FCA counsel, D. Oien and S. Maizel re UST inquiry and next steps (.2); follow up emails regarding same (.1); prepare email to UST re same (.1) and call with L. Jones (.1).
07/12/22	T. Moyron	1.90	1,501.00	B110	Team meeting with FTI on status of pending matters, issues to be analyzed and addressed, and next steps.

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07/12/22	T. Moyron	1.00	790.00	B110	Meeting with FTI and Company re KERP/KEIP.
07/12/22	G. Medina	0.30	108.00	B110	Correspond with L. Harrison and send all first day motions and declarations filed per his request.
07/12/22	G. Medina	0.80	288.00	B110	Met with S. Schrag regarding notice of bankruptcy and automatic stay related to pending litigations (0.2); review correspondence and list of pending litigations received from S. Schrag (0.1); work on draft of Notice of bankruptcy to be filed in those proceedings (0.5).
07/12/22	T. Fowler	0.40	106.00	B110	Research and obtain requested cases and subsequent citing opinions re sales and related issues.
07/12/22	S. Schrag	1.00	650.00	B110	Confer with Dentons (T. Moyron, L. Smith, A. Helman, C. Montgomery, C. O'Leary) and FTI (T. Meerovich, W. Nolan, M.A. Kaptain) to address outstanding issues, including Fannie Mae payments to TCB controlled account, GSEs requests for information, workflow streams, critical vendors.
07/12/22	S. Schrag	1.00	650.00	B110	Confer with Dentons (T. Moyron, L. Smith, A. Helman, C. Montgomery, C. O'Leary) and FTI (T. Meerovich, W. Nolan, M.A. Kaptain) to address outstanding issues, including Fannie Mae payments to TCB controlled account, GSEs requests for information, workflow streams, critical vendors.
07/12/22	S. Schrag	1.00	650.00	B110	Confer with Dentons (T. Moyron, L. Smith, A. Helman, C. Montgomery, C. O'Leary) and FTI (T. Meerovich, W. Nolan, M.A. Kaptain) to address outstanding issues, including Fannie Mae payments to TCB controlled account, GSEs requests for information, workflow streams, critical vendors.

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07/13/22	G. Medina	2.00	720.00	B110	Correspond with S. Schrag regarding pending litigations and Notice of Bankruptcy (0.2); review dockets for each pending case (0.7); retrieved Notice of Bankruptcy filed in two cases (0.4); draft notice of Bankruptcy and Automatic stay (0.4); correspond with S. Schrag regarding pending cases (0.3).
07/13/22	G. Miller	0.70	539.00	B110	Review Rushmore vendor agreement.
07/13/22	G. Miller	1.20	924.00	B110	Emails with FTI and Dentons re Rushmore prepetition claim.
07/13/22	S. Schrag	0.90	585.00	B110	Revise goals and objectives list (.6); confer with T. Moyron regarding the same (.3).
07/13/22	K.M. Howard	0.40	136.00	B110	Analysis of email chain regarding Notices of Bankruptcy to be filed in other states and email exchanges regarding same.
07/13/22	J. Murphy	2.70	2,821.50	B110	Review file for Rushmore side letter; pre-call C. Montgomery and T. Moyron et al re responses to Rushmore and Paul Weiss/TCB.
07/13/22	T. Moyron	0.20	158.00	B110	Communications with S. Schrag re notice of bankruptcy.
07/14/22	J. Murphy	1.70	1,776.50	B110	Respond to FTI ask re haircut on Ginnie Mae loans in Barclay repo. review MRA and Pricing Letter for same.
07/14/22	K.M. Howard	0.40	136.00	B110	Telephone conference with S. Schrag regarding Notices of Bankruptcy (.1); review email from S. Schrag regarding same and review attached chart (.2); prepare responsive email (.1).
07/14/22	T. Moyron	2.00	1,580.00	B110	Teams meeting with FTI and Dentons regarding open tasks and strategy with respect to various items.
07/14/22	E. Cobarrubias	0.50	175.00	B110	Locate and pull copies of motion of Lehman Brothers Inc for Order Pursuant to Section 105 of Bankruptcy Code Confirming Status of Clearance Advances filed on 9/16/2008 and Judge Peck's order issued the same date, for Kathryn Howard.
07/14/22	S. Schrag	1.10	715.00	B110	Revise goals and objectives (.9); confer with T. Moyron regarding the same (.2).

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07/14/22	S. Schrag	0.70	455.00	B110	Attend call with US trustee, L. Davis Jones, T. Meerovich, T. Moyron to discuss outstanding issues, including US trustee fees, various bank accounts, and other initial debtor interview material.
07/14/22	S. Schrag	2.00	1,300.00	B110	Participate in reoccurring call between Dentons (T. Moyron, C. O'Leary, A. Helman, S. Alberts, C. Montgomery, etc.) and FTI (T. Meerovich, W. Nolan, J. Krasne, etc.) regarding outstanding issues, including potential rejection motion, KEIP and KERP, Board resolutions, various bank accounts and rights to funds therein.
07/15/22	S. Schrag	0.20	130.00	B110	Reoccurring call with J. John and J. Krasne regarding outstanding issues, including insiders, motion to reject, and notice of bankruptcy.
07/15/22	S. Schrag	0.40	260.00	B110	Confer with M.A. Kaptain of FTI regarding research related to insiders.
07/15/22	K.M. Howard	0.50	170.00	B110	Analysis of docket in Slater v. FGMC (.1); prepare Notice of Bankruptcy and Stay (.3); review and revise same (.1).
07/15/22	K.M. Howard	0.50	170.00	B110	Analysis of docket in Nyankumah v. FGMC (.1); prepare Notice of Bankruptcy and Stay (.3); review and revise same (.1).
07/15/22	K.M. Howard	0.50	170.00	B110	Analysis of docket in Ciras v. FGMC (.1); prepare Notice of Bankruptcy and Stay (.3); review and revise same (.1).
07/15/22	K.M. Howard	0.50	170.00	B110	Analysis of docket in Mosser v. FGMC (.1); prepare Notice of Bankruptcy and Stay (.3); review and revise same (.1).
07/15/22	K.M. Howard	0.50	170.00	B110	Analysis of docket in Buckley v. FGMC (.1); prepare Notice of Bankruptcy and Stay (.3); review and revise same (.1).
07/15/22	K.M. Howard	0.50	170.00	B110	Analysis of docket in Wolter v. FGMC (.1); prepare Notice of Bankruptcy and Stay (.3); review and revise same (.1).
07/15/22	K.M. Howard	0.50	170.00	B110	Analysis of docket in Jackson v. FGMC (.1); prepare Notice of Bankruptcy and Stay (.3); review and revise same (.1).

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07/15/22	K.M. Howard	0.50	170.00	B110	Analysis of docket in Vansingel v. FGMC (.1); prepare Notice of Bankruptcy and Stay (.3); review and revise same (.1).
07/15/22	K.M. Howard	0.30	102.00	B110	Telephone conferences (x2) with L. Sheridan regarding servicing rights issues, repurchase and liquidating assets.
07/15/22	K.M. Howard	3.10	1,054.00	B110	Research servicing rights, 363(c)(1), 363(b)(1), 506(c) issues including liquidating collateral and assets (2.4); assemble key documents and motions in support thereto (.5); prepare emails to L. Sheridan regarding same (.2).
07/15/22	T. Moyron	0.20	158.00	B110	Analyze email from B. Hackman re questions/comments regarding various motions, including seal motion and employment motions and respond to same (.1); prepare email to S. Maizel, et al., re same (.1).
07/17/22	L. Macksoud	0.50	385.00	B110	Call with A. Helman to discuss final cash management order and set off issue.
07/18/22	T. Moyron	0.10	79.00	B110	Correspond with T. Meerovich regarding agency slides.
07/18/22	C. Montgomery	0.30	363.00	B110	Communications with J. Grebinar, T. Moyron regarding creditor matrix (.3).
07/18/22	S. Alberts	0.60	594.00	B110	Review and provide comments to press inquiries concerning employee issues and follow up.
07/18/22	P. O'Connell	0.30	331.50	B110	Provide assistance with District of Nevada filing; exchange emails with S. Schrag and S. Dilorio re same - cumulative.15.
07/18/22	S. Maizel	0.50	485.00	B110	Zoom call with T. Moyron, A. Helman, etc. re cash management motion and other pending issues.
07/18/22	S. Maizel	0.50	485.00	B110	Zoom call with Buckley attorneys, D. Oien, etc. re regulatory issues.
07/18/22	S. Maizel	0.70	679.00	B110	Zoom call with A. Samples, FTI, etc. re GSE issues.
07/18/22	S. Maizel	0.50	485.00	B110	Zoom call with C. Montgomery, T. Moyron, etc. re Rushmore issues, etc.

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07/18/22	S. Maizel	1.00	970.00	B110	Pillowtex analysis of prepetition payments for US Trustee office.
07/18/22	K.M. Howard	0.20	68.00	B110	Review Stipulated Order to Segregate pursuant to 363(c)(4) and incorporate same.
07/18/22	K.M. Howard	0.30	102.00	B110	Review and revise Notice of Bankruptcy and Stay of Case in Ciras.
07/18/22	K.M. Howard	0.70	238.00	B110	Prepare Notice of Appearance of Andrew Poindexter in Ciras v. FGMC.
07/18/22	K.M. Howard	0.30	102.00	B110	Email exchanges with A. Poindexter and S. Schrag regarding the Notice of Appearance of Andrew Poindexter in Ciras.
07/18/22	K.M. Howard	0.40	136.00	B110	Review and coordinate filing of Notice of Bankruptcy and Stay in Wolker v. FGMC including email exchanges regarding same.
07/18/22	K.M. Howard	0.10	34.00	B110	Receive and review conformed Notice of Bankruptcy and Stay in Wolter v. FGMC.
07/18/22	K.M. Howard	0.10	34.00	B110	Prepare email to S. Schrag regarding conformed Notice of Bankruptcy and Stay in Wolter v. FGMC.
07/18/22	K.M. Howard	0.20	68.00	B110	Email exchanges with A. Poindexter regarding Notice of Bankruptcy and Notice of Appearance.
07/18/22	K.M. Howard	0.10	34.00	B110	Analysis of email from S. Schrag regarding changes to Notice of Appearance.
07/18/22	K.M. Howard	0.30	102.00	B110	Revise Notice of Appearance of A. Poindexter.
07/18/22	K.M. Howard	0.20	68.00	B110	Email exchanges with G. Dattoli coordinating filings in the United States District Court for the Eastern District of Texas.
07/18/22	K.M. Howard	0.20	68.00	B110	Email exchanges with S. Schrag regarding the USDC Eastern District of Texas.
07/18/22	K.M. Howard	0.20	68.00	B110	Review and finalize the Notice of Bankruptcy and Stay in Ciras v. FGMC.
07/18/22	K.M. Howard	0.20	68.00	B110	Review and finalize the Notice of Appearance of A. Poindexter in Ciras v. FGMC.

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07/18/22	K.M. Howard	0.20	68.00	B110	Email exchanges with G. Datolli regarding the Notice of Appearance and Notice of Bankruptcy and Stay in Ciras v. FGMA.
07/18/22	K.M. Howard	0.30	102.00	B110	Review and finalize the Notice of Bankruptcy and Stay in Jackson v. FGMC (.2); prepare email to T. Cunneen regarding same (.1).
07/18/22	K.M. Howard	0.30	102.00	B110	Review and finalize the Notice of Bankruptcy and Stay in Slater v. FGMC (.2); prepare email to T. Cunneen regarding same (.1).
07/18/22	K.M. Howard	0.30	102.00	B110	Review and finalize the Notice of Bankruptcy and Stay in Vansingel v. FGMC (.2); prepare email to T. Cunneen regarding same (.1).
07/18/22	K.M. Howard	0.40	136.00	B110	Prepare email to S. Schrag regarding the filed documents in Jackson v. FGMC (.1); Prepare email to S. Schrag regarding the filed documents in Vansingel v. FGMC (.1); Prepare email to S. Schrag regarding the filed documents in Slater v. FGMC (.1); Prepare email to S. Schrag regarding the filed documents in Ciras v. FGMC (.1).
07/18/22	L. Macksoud	5.90	4,543.00	B110	Review cash management motion and interim order, review proposed final order and further revise same (1.4), calls and emails with A. Helman, T. Moyron and FTI to discuss accounts and flow of funds through each (2.2), call with Dentons working group to discuss committee appointment and upcoming second day hearing (.7), call with FTI to discuss failed trade (.4), call with counsel to Flagstar to discuss cash collateral issues (.5), further review and comment on draft stipulations with agencies and warehouse lenders (.4), emails with counsel to Fannie and Freddie re open issues (.3).
07/18/22	S. Schrag	2.10	1,365.00	B110	Revise goals and objectives (1.9); confer with T. Moyron regarding the same (.2).
07/19/22	S. Schrag	2.10	1,365.00	B110	Revise goals and objectives (1.8); confer with T. Moyron regarding the same (.3).

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07/19/22	S. Schrag	0.50	325.00	B110	Confer with N. Peterman of Greenburg, T. Moyron, C. Montgomery, and L. Macksoud regarding Second Day Hearing Orders as well as GSE resolutions.
07/19/22	C. Montgomery	1.00	1,210.00	B110	Check-in issues MATeams call with T. Meerovich, EL Smith, J. Krasne, T. Moyron and others (1.0).
07/19/22	K.M. Howard	0.20	68.00	B110	Several email exchanges regarding the Ciras case filed in Hancock County Circuit Court.
07/19/22	G. Miller	0.50	385.00	B110	Emails with B.Bains re proposed final insurance order.
07/19/22	G. Miller	0.70	539.00	B110	Call with J.John re schedules and statements of financial affairs.
07/19/22	G. Miller	2.40	1,848.00	B110	Analyze statement of financial affairs questions and email J.John re same.
07/19/22	S. Maizel	0.20	194.00	B110	Telephone conference with T. Moyron re pending issues.
07/19/22	S. Maizel	1.10	1,067.00	B110	Zoom conference with FTI, A. Samples, etc re pending issues.
07/19/22	S. Maizel	0.20	194.00	B110	Zoom conference with FTI, T. Moyron, etc. re pending issues.
07/19/22	S. Maizel	0.10	97.00	B110	Telephone conference with T. Moyron re pending issues.
07/19/22	S. Maizel	0.20	194.00	B110	Telephone conference with T. Moyron re pending issues.
07/19/22	S. Maizel	1.00	970.00	B110	Conducting Pillowtex analysis for US Trustee (.7); review and respond to emails from T. Gray re same (.3).
07/19/22	S. Alberts	0.60	594.00	B110	Receive request for employee communication for those who are expected to remain past September RIF (.4) and follow up.
07/19/22	T. Moyron	0.60	474.00	B110	Teams meeting with T. Meerovich, L. Macksoud, et al., to discuss status and updates on work streams (.5); call with M. Kaptain, et al., re SOFAs/Schedules (.1).
07/19/22	T. Moyron	0.90	711.00	B110	Conference call with N. Peterman, M. Schwarzmman, B. Nolan, et al., re KERP/KEIP & Freddie Mac.

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07/19/22	T. Moyron	0.10	79.00	B110	Call with T. Cairns regarding various calls from customers.
07/19/22	T. Moyron	0.40	316.00	B110	Correspond with J. John re Schedules/SOFA (.2); correspond with G. Miller re same (.2).
07/20/22	T. Moyron	0.30	237.00	B110	Conference call with N. Peterman re pending matters, including GSEs, timing of delivery of term sheet, and other matters.
07/20/22	T. Moyron	0.10	79.00	B110	Call with T. Meerovich regarding TCB and FNMA.
07/20/22	L. Macksoud	5.00	3,850.00	B110	Call with Dentons and FTI team re setoff of funds by Texas Capital Bank (.4), call with Dentons team re potential stay violation (.8), review relevant case law and review terms of entered cash management order relating to same (1.4), call with counsel to South Street re potential DIP objection (.5), emails with warehouse counterparties re cash flow dip order comments and exhibits to cash management order (.7), call with FTI re release of funds related to certain transactions (.3), review correspondence from counsel to Planet Home re MSR agreements and review proposed comments to cash management and dip orders relating to same (.3), confer with L. Smith and C. O'Leary re same (.3), call with working group re MSR sale issue (.5).
07/20/22	S. Maizel	0.20	194.00	B110	Telephone conference with T. Moyron re pending issues.
07/20/22	S. Maizel	0.30	291.00	B110	Zoom call with Company, FTI, etc. re recurring legal issues.
07/20/22	S. Maizel	0.20	194.00	B110	Telephone conference with T. Moyron re pending issues.
07/20/22	S. Maizel	0.40	388.00	B110	Telephone conference (x2) with T. Moyron re pending issues.
07/20/22	T. Moyron	0.20	158.00	B110	Correspond with M. Powers regarding meeting with FGMC, Committee, and advisors (.1); correspond with Company re same (.2).

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07/20/22	S. Alberts	0.40	396.00	B110	Review docket (.2), follow up on status of my pro hac vice motion (.1), receive and review pro hac vice order (.1).
07/20/22	S. Schrag	0.30	195.00	B110	Review correspondence related to DIP Orders.
07/21/22	S. Schrag	0.20	130.00	B110	Revise goals and objectives (.1); confer with T. Moyron and S. Maizel regarding the same (.1).
07/21/22	S. Maizel	0.80	776.00	B110	Telephone conference with FTI, J. Johns, etc. re critical vendors.
07/21/22	S. Maizel	1.00	970.00	B110	Telephone conference with Company, FTI, etc. re open items and pending issues.
07/21/22	S. Maizel	0.30	291.00	B110	Telephone conference with T. Moyron re pending issues.
07/21/22	S. Maizel	0.50	485.00	B110	Telephone conference with L.D. Jones re pending issues.
07/21/22	L. Macksoud	4.00	3,080.00	B110	Dentons and FTI catch up call (1.0), call with C. O'Leary and C. Montgomery to discuss Planet Home issue (.5), confer with counsel to cash flow dip lender re same (.4), emails with company and counsel to TCB regarding Fannie Mae payment and corrected account number (.5), confer with counsel to BMO regarding returned wire (.2), draft email to Tysons Corner's landlord counsel regarding delayed payment (.2), confer with T. Moyron and FTI re additional cash management and account issues (.3), review amended and restated DACA and confer with counsel to DIP lender re same (.7), confer with committee and FTI team re call to discuss open items (.2).
07/21/22	C. Montgomery	1.10	1,331.00	B110	Participate in FTI checklist call including T. Meerovich, L. Smith, L. Macksoud and C. O'Leary (1.1).
07/21/22	T. Moyron	0.20	158.00	B110	Analyze Pillowtex analysis.
07/21/22	T. Moyron	0.60	474.00	B110	Conference calls with S. Maizel regarding pending issues, including KEIP, KEIP.
07/21/22	T. Moyron	0.30	237.00	B110	Analyze critical vendor matters (.2); analyze email from T. Becker, et al., re news (.1);

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07/22/22	G. Miller	0.50	385.00	B110	Emails with J. John re completion of schedules and statements of financial affairs.
07/22/22	G. Miller	0.20	154.00	B110	Call with former employee re notice of bankruptcy filing.
07/22/22	G. Miller	0.50	385.00	B110	Calls with FTI and FGMC re schedules and statements.
07/22/22	C. Montgomery	2.10	2,541.00	B110	Task check in call via Zoom with T. Meerovich, W. Noland, L. Macksoud and others (1.1); participate in Zoom call with L. Jones, T. Cairns T. Moyron re coordinating Second Day hearings and Committee issues (1.0).
07/22/22	L. Macksoud	6.50	5,005.00	B110	Calls and emails with various warehouse lenders regarding comments and revisions to draft cash management order, DIP orders and potential order for final stipulation re segregated accounts (1.7), call with C. Montgomery to discuss same (.8) and revise orders per same (1.0), call with Dentons and FTI to discuss cash accounts and appropriate use going forward (1.2), call with committee counsel to discuss second day hearing and possible objections (.5), call with FTI and company re open items (1.0), confer with counsel to TCB re transfer of funds wired by Fannie (.3).
07/22/22	J. Milko	0.30	96.00	B110	Prepared signature page packets for C. O' Leary.
07/22/22	S. Maizel	1.00	970.00	B110	Zoom conference with FTI, etc. re pending issues.
07/22/22	S. Maizel	0.20	194.00	B110	Telephone conference with T. Moyron re UCC issues, etc.
07/22/22	T. Moyron	1.00	790.00	B110	Teams meeting with FTI, Dentons re pending issues.
07/22/22	T. Moyron	0.50	395.00	B110	Call with DOJ, S. Maizel, re GNMA and request for extension of time.
07/22/22	T. Moyron	1.00	790.00	B110	Conference call with L. Jones, L. Smith, M. Caloway et al. re upcoming hearing, status of orders, and next steps.

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07/22/22	D. Cook	2.40	1,488.00	B110	Draft motion status tracker for use in administering chapter 11 cases.
07/23/22	L. Macksoud	2.90	2,233.00	B110	Draft and review email to counsel to FNMA requesting confirmation of release of funds (.2) and confer with working group re same (.2), review comments to draft orders provided by US DOJ and review additional comments provided by counsel to warehouse lenders (.6), further revise draft cash management order (.9), review revised exhibits to cash management order and confer with FTI re same (.5) , call with C. Montgomery to discuss proposed edits to order (.3) and confer with T. Moyron re status of all second day orders (.2).
07/23/22	D. Cook	0.40	248.00	B110	Revise motion status tracker for use in administering chapter 11 cases (.2);email communication with T Moyron regarding same (.1); email communication with PSZJ regarding same (.1).
07/23/22	G. Miller	0.90	693.00	B110	Draft final orders approving critical vendor motion and insurance motion.
07/23/22	C. Doherty, Jr.	0.20	139.00	B110	Review and respond to emails re Wage Motion.
07/24/22	L. Macksoud	6.00	4,620.00	B110	Call with dip lender counsel to discuss edits to cash flow dip order (1.0), call with counsel to Ginnie Mae re same (.4), call and emails with FTI re cash accounts (.6) and further review and revise cash management order and exhibits thereto (1.1), draft emails to warehouse lenders and committee counsel re draft of final cash management order (.3), call with committee counsel to discuss case status and dip loans (1.0), follow up call with Dentons working group on all open issues (.6), review Ginnie language proposed for DIP orders and confer with C. O'Leary and C. Montgomery re same (.5), confer with counsel to DIP lender on further edits to cash flow DIP order re same (.5).
07/25/22	T. Moyron	0.10	79.00	B110	Correspond with M. Caloway re orders and status.

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07/25/22	T. Moyron	0.10	79.00	B110	Correspond with L. Jones regarding conflicts list and Committee request.
07/25/22	T. Moyron	0.10	79.00	B110	Analyze emails from T. Becker, et al., re media inquiry.
07/25/22	T. Moyron	0.60	474.00	B110	Conference call with L. Jones regarding upcoming second day hearing, plan term sheet and other matters (.5); and correspond with L. Jones re same (.1).
07/25/22	L. Macksoud	9.70	7,469.00	B110	Call with Dentons and FTI working group re Freddie term sheet and draft plan term sheet (.5), call with counsel to Flagstar regarding potential lift stay motion or stipulation (.4), call with counsel to JVB regarding comments to cash management order (.2), call with Committee counsel to discuss comments to cash management order (.4), draft and revise proposed Ginnie Mae language for insertion into Cash Flow DIP order (.7) and confer with counsel to Ginnie and counsel to DIP Lender re same (.4), call with counsel to Rushmore to discuss open issues (.6), preparation for same with L. Smith on repo issue (.2) and G. Miller on critical vendor issue (.2), review and revise email to working group to summarize Rushmore issue (.3), review Committee objections to DIP motions and critical vendor motion (.9), call with Dentons and FTI working group to discuss same and prepare for second day hearing (2.5), call with counsel to TCB to discuss 506(c) waiver issue and comments to cash management and DIP orders (.5), review comments to CMO from counsel to Freddie and counsel to Customers and Flagstar and update CMO per same (1.2), call with counsel to cash flow dip lender to discuss committee objection (.5), emails with local counsel re agenda and witness list for second day hearing (.2).
07/25/22	M. Zeefe	0.10	69.00	B110	Review proposed final utilities order.
07/25/22	G. Miller	1.50	1,155.00	B110	Emails with B. Bains, M. Calloway and J. John re final order granting insurance motion.

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07/25/22	G. Miller	0.40	308.00	B110	Call with FTI, KCC and FGMC re preparation of schedules and statements.
07/26/22	C. Montgomery	2.30	2,783.00	B110	Critical issues update call with T. Meerovich, W. Nolan, S. Maizel and others.
07/26/22	S. Alberts	0.40	396.00	B110	Conference with S. Maizel and T. Moyron about broader case issues.
07/26/22	S. Maizel	0.20	194.00	B110	Telephone conference with T. Moyron re pending issues.
07/26/22	S. Maizel	0.20	194.00	B110	Review and revise draft response re Customers 559 Motion.
07/26/22	T. Moyron	2.00	1,580.00	B110	Teams meeting with T. Meerovich, C. Montgomery, L. Macksoud, et al., regarding pending issues, including upcoming Committee meeting, warehouse lenders, and matters related to pending orders.
07/26/22	T. Moyron	0.60	474.00	B110	Call with Committee and Cash Flow DIP advisors, including M. Power and N. Peterman re Committee objection and issues, potential resolution and continuance (.5); correspond with A. Samples, et al. re closing schedule requested by Committee (.1).
07/26/22	C. Doherty, Jr.	1.30	903.50	B110	Call with L. Jones, M. Calloway, S. Alberts and T. Moyron re employee issues and upcoming hearing (.9); review and respond to emails re Wage motion and employee matters (.2); provide written legal analysis regarding precedent for purposes of hearing (.2).
07/26/22	G. Medina	0.40	144.00	B110	Registered L. Macksoud, S. Alberts, L. Smith and C. O'Leary for the Zoom hearing scheduled for July 28, 2022, per the request of T. Moyron.
07/27/22	D. Cook	3.10	1,922.00	B110	Revise case motion/issue tracker in light of recent case filings.
07/27/22	C. Doherty, Jr.	0.80	556.00	B110	Call with S. Alberts, M. Captain regarding employee matters and Wage Motion (.5); review and respond to emails re Wage Motion (.3).

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07/27/22	T. Moyron	0.60	474.00	B110	Conference call with M. Power re agreement to continue final hearings (.1); correspond with N. Peterman re same (.1); correspond with M. Caloway, et al., re continuance and notification thereof (.4).
07/27/22	L. Macksoud	8.50	6,545.00	B110	Review further revisions to cash flow dip order circulated by counsel to DIP lender (.5), review further comments from GSE's and emails with counsel (.3), review reservations of rights and objections submitted by Flagstar, Ginnie, Fannie, and Customers (.8), call with creditors' committee and counsel to provide case overview and discuss case goals (1.0), review Customers 559 motion and review and revise draft order resolving same (.5), confer with counsel to Rushmore re same (.2), participate in call with Rushmore and Customers to discuss subservicing issues and to resolve motion (1.0), call with FTI to discuss certain Fannie accounts (.4) and draft email to counsel to Fannie re same (.1), call with counsel to Flagstar re 506(c) waiver issue (.5), review various proposed revisions to dip order in preparation for calls (.8), call with counsel to Flagstar re DIP comments (.5) and confer with counsel to dip lender re same (.7), review violation notice submitted by Ginnie and confer with working group re same (.4), call with T. Moyron to discuss open case issues (.5), emails with D. Cook to discuss objection to 559 motion (.2) and draft email to Customers' counsel re same (.1).
07/27/22	G. Miller	0.50	385.00	B110	Revise reply in support of critical vendor motion.
07/27/22	S. Schrag	0.30	195.00	B110	Reoccurring call with D. Oien, J. John, and J. Krasne regarding outstanding issues, including motion to reject leases, ordinary course of business professionals, and committee call.
07/27/22	G. Miller	1.10	847.00	B110	Review draft global notes re schedules and statements.
07/27/22	G. Miller	0.20	154.00	B110	Call with FTI, FGMC and KCC re preparation of schedules and statements.

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07/27/22	G. Miller	0.20	154.00	B110	Call with M.Calloway re cancellation of surety bonds.
07/28/22	G. Miller	0.10	77.00	B110	Follow up with UCC re critical vendor list.
07/28/22	S. Schrag	0.20	130.00	B110	Confer with J. John regarding outstanding issue.
07/28/22	T. Moyron	0.10	79.00	B110	Correspond with N. Peterman re articles and related matters.
07/28/22	L. Macksoud	11.80	9,086.00	B110	Review additional pleadings, objections, and reservations of rights filed by parties in interest related to first day motions and Customers 559 motion (1.5), call with Customers and Rushmore to discuss proposed order and resolution to 559 motion (1.0), review revisions to proposed order (.4) and confer with counsel to Customers related to relief sought therein (1.1), further review and revise Cash Management Order per comments from parties in interest (.8), confer with counsel to Fannie and Freddie re same (.5), confer with company re certain cash accounts (.3), draft email to working group re proposed final Cash Management Order (.2), call with counsel to DIP Lender re open issues in cash flow dip order (.4), review additional comments thereto (.7) and call with C. Montgomery to discuss same (.4), draft email to working group re proposed final order (.2), confer with working group re MSR sales (.5), call with counsel to JVB re transfer of servicing rights (.3), confer with T. Moyron re preparation of witnesses for second day hearings (.5) and call and emails with local counsel to discuss waiver issue, 559 response filing and timing to file revised orders (.8), review and revise draft reply to committee objection (1.7) and confer with D. Cook re same (.5).
07/28/22	C. Doherty, Jr.	0.20	139.00	B110	Analyze contracts from data room regarding employee bankruptcy matter.
07/28/22	D. Cook	0.40	248.00	B110	Revise case motion/issue tracker in light of recent case filings and events.
07/29/22	C. Montgomery	0.30	363.00	B110	Communications with T. Moyron and A. Samples regarding quarterly reports.

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07/29/22	K.M. Howard	3.30	1,122.00	B110	Email exchanges with S. Maizel and T. Moyron regarding the matters before the court on August 2, 2022 (.1); review amended notice of agenda (.2); email exchange with S. Maizel and T. Moyron regarding same (.1); review docket and assemble all related pleading pertaining to the matters before the court on August 2, 2022 (1.9); organize pleadings (.2); email exchanges with I. Cruz and Copy Center regarding preparation of pleadings (.1); prepare email to Copy Center and A. Aguilar regarding delivery of hearing materials to S. Maizel and T. Moyron (.1); email exchange with T. Moyron regarding additional document (.1); email exchanges with copy center regarding status of project (.1); email exchanges with Ace Messenger regarding coordination of delivery (.1); email exchanges with copy center regarding receipt of additional document from T. Moyron (.1); email exchange regarding confirmation of delivery of hearing materials to S. Maizel (.1); review email confirming delivery of hearing materials to T. Moyron and prepare response thereto (.1).
07/29/22	G. Miller	0.20	154.00	B110	Review draft stipulation canceling CO Bonds.
07/29/22	G. Miller	0.20	154.00	B110	Call with FTI and FGMC to discuss preparation of schedules and statements.
07/29/22	G. Miller	0.60	462.00	B110	Call with FTI to discuss critical vendor issues (.5); Email T. Moyron and S. Maizel update re same (.1).
07/29/22	G. Miller	0.50	385.00	B110	Calls with S. Maizel, M. Jaconson and M. Kaptain re insiders.
07/30/22	S. Maizel	0.40	388.00	B110	Telephone conference with T. Moyron re issues related to second day hearing on motions.
07/30/22	T. Moyron	0.40	316.00	B110	Call with S. Maizel regarding pending matters, pleadings, and upcoming hearing.
07/31/22	T. Moyron	0.10	79.00	B110	Call with L. Jones re pending issues and upcoming hearing.

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Date	Timekeeper	Hours	Amount	Task	Narrative
07/31/22	L. Macksoud	7.50	5,775.00	B110	Participate in witness preparation with working groups from FTI and Dentons (3.5), call with counsel to DIP lender to discuss committee offer and additional hearing prep (1.0), call with counsel to Freddie to discuss 559 issues (.5), review proposed language and confer with C. Montgomery re implication of same and re need to duplicate for other agencies (.7), confer with counsel to Customers re 559 motion (.3), confer with local counsel re filing of 550 ROR (.2), further review and comment on draft DIP reply and declaration is support thereof (.8), prepare hearing notes in advance of second day hearing (.5).
Subtotal		331.60	258,332.50		

B120 - Asset Analysis and Recovery

Date	Timekeeper	Hours	Amount	Task	Narrative
07/11/22	G. Miller	0.70	539.00	B120	Call with M. Jacobson and M. Kaptain re critical vendors.
07/12/22	G. Miller	0.30	231.00	B120	Call with R. Richards re supplementing critical vendor motion.
07/12/22	D. Cook	3.60	2,232.00	B120	Analysis in connection with possible recoupment of severance payments as potentially avoidable transfers in context of recoupment analysis.
07/13/22	G. Miller	0.20	154.00	B120	Emails with Dentons team re critical vendor payments.
07/13/22	C. Montgomery	0.50	605.00	B120	Pipeline sale discussion with T. Meerovich, T. Moyron and others.
07/21/22	G. Miller	0.50	385.00	B120	Emails with S. Schrag re recovery of deposits from landlords.
07/28/22	G. Miller	0.80	616.00	B120	Call with C.O'Leary and L.Harrison re MSR sale.
07/28/22	G. Miller	0.60	462.00	B120	Review draft letter of intent to purchase MSR.
07/28/22	G. Miller	0.90	693.00	B120	Review draft motion to sell servicing rights (.6); Call with L.Harrison re same (.3)
07/28/22	G. Miller	0.70	539.00	B120	Call with Dentons team re MSR sale.

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Date	Timekeeper	Hours	Amount	Task	Narrative
	Subtotal	8.80	6,456.00		

B130 - Asset Disposition

Date	Timekeeper	Hours	Amount	Task	Narrative
06/30/22	S. Maizel	1.00	970.00	B130	Review and respond to emails re issues related to REPO agreement with Barclays.
07/01/22	L. Harrison	1.50	1,710.00	B130	Revisit possibility of sale of some or all of assets vis-a-vis 363 and related opinion.
07/05/22	L. Harrison	3.80	4,332.00	B130	Attention to 363 opinion and summarize same for circulation to T. Moyron and S. Maizel.
07/05/22	T. Moyron	0.30	237.00	B130	Analyze issues related to sale.
07/06/22	E. Smith	2.30	2,357.50	B130	Attended call with FTI, T. Meerovitch, FGMC, A. Samples, and Dentons, T. Myron, and others to plan for asset disposal scenarios, and Bankruptcy Court-supervised sale process options.
07/06/22	E. Smith	1.20	1,230.00	B130	Attended call with T. Moyron, A. Samples, J. Krasne, T. Meerovich, C. O'Leary and others to discuss plans for next steps with disposal of loans owned by warehouse providers and loans owned by FGMC, and return of collateral files for loans not being acquired by FGMC.
07/06/22	L. Harrison	1.00	1,140.00	B130	Draft and circulate email attaching recent 363 opinion to T. Moyron and S. Maizel.
07/07/22	D. Cook	0.60	372.00	B130	Participate in Dentons team call regarding potential asset sale (.5); email communication with T Moyron and S Maizel regarding same (.1).
07/07/22	T. Moyron	0.50	395.00	B130	Exchange emails with Company regarding inquiries from Bravo (.2); send emails to Greenberg, et al. re same (.1); prepare email to Company regarding Fannie request (.1); and review email from counsel from Fannie (.1).
07/07/22	T. Moyron	1.20	948.00	B130	Zoom meeting with FTI, Company, and Dentons re warehouse lenders, GSEs, and related matters.

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Date	Timekeeper	Hours	Amount	Task	Narrative
07/07/22	T. Moyron	0.60	474.00	B130	Conference call with L. Smith re GSEs, warehouse lenders, potential sales and process.
07/07/22	T. Moyron	0.20	158.00	B130	Analyze emails from M. Schwarzmman, T. Meerovich, et al., re pipeline and sale process.
07/07/22	S. Maizel	0.40	388.00	B130	Telephone conference with Freddie Mac representatives, etc. re pending issues related to disposition of loans.
07/07/22	S. Maizel	0.50	485.00	B130	Telephone conference re TCB issues with Dentons, PSZJ, etc.
07/07/22	C. Montgomery	2.60	3,146.00	B130	Review originator proposals (.4); review ordinary course decision 3rd Circuit (.1); Dentons only TCB sale call with T. Moyron, E. L. Smith and T. Moyron (.8); review 549 and 559 (.1); participate in zoom call with Fannie Mae in S. Warren and T. Moyron (.6); sale process call L. Davis, Jones, T Moyron, S. Maizel (.6).
07/07/22	L. Macksoud	4.90	3,773.00	B130	Call with counsel to Freddie Mac re agency approval and purchase (.4), call with counsel to TCB re potential purchase of assets or close out under section 559 (.5), internal follow up call with working group (.4), further discussion with C. Montgomery re same (.3). call with counsel to TCB re repo close out (.4), call with counsels to Customers and Flagstar re transfer of loan files (.5), call with Dentons and FTI working group re sale process (.5), call with local counsel re same (.5), review and respond to various emails re same (.8), call with client to discuss servicing issues (.6).
07/07/22	E. Smith	0.60	615.00	B130	Attend call with counsel for Texas Capital Bank, T. Moyron and C. Montgomery regarding facilitation of liquidation of loans on TCB warehouse line and termination of repo.
07/07/22	E. Smith	1.30	1,332.50	B130	Attended calls with T. Moyron and counsel for warehouse lender Customers Bank, T. Kelly, Dorsey, and Flagstar, J. Feldsher, Morgan Lewis, to discuss disposal of assets on warehouse lines.

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Date	Timekeeper	Hours	Amount	Task	Narrative
07/07/22	E. Smith	0.10	102.50	B130	Reviewed Bankruptcy Court residential mortgage loan sale/363(o) decision in In re Ditech; reviewed analysis of Ditech loan sale decision.
07/07/22	E. Smith	1.40	1,435.00	B130	Attended calls with T. Moyron, S. Maizel and other members of Dentons team regarding sources of mortgage loan inventory and loan sale structure/process.
07/07/22	E. Smith	1.10	1,127.50	B130	Attended calls with FTI, T. Meerovitch, FGMC, A. Samples, and Dentons team, T. Moyron regarding loan sale alternatives, and reviewed and prepared correspondence with T. Moyron and C. O'Leary regarding same.
07/07/22	E. Smith	1.00	1,025.00	B130	Confer with T. Myron and other Dentons team members regarding warehouse loan sale option analysis.
07/07/22	E. Smith	0.80	820.00	B130	Confer with representatives of FGMC and FNMA with T. Moyron and C. Montgomery, and FTI, W. Nolan and T. Meerovitch, regarding receptivity to purchasing newly originated loans from FGMC.
07/07/22	T. Moyron	0.10	79.00	B130	Correspond with C. Montgomery re sale process.
07/08/22	E. Smith	2.10	2,152.50	B130	Review and prepare correspondence regarding opportunity for MBS securities trade this morning (1.1); confer with T. Moyron and team regarding related communication with counsel for affected warehouse liquidity providers (0.7); confer with C. O'Leary regarding disposal of MBS and loan assets on warehouse lines (0.3).
07/08/22	E. Smith	1.20	1,230.00	B130	Attend all hands call with FGMC, D. Oien and T. Ramm, FTI, W. Nolan and T. Meerovitch, and Dentons, T. Myron, regarding loan sale (0.7); prepared communication with counsel for warehouse provider regarding loan sale process (0.5).
07/08/22	E. Smith	0.50	512.50	B130	Reviewed and prepared warehouse lender (T. Kelly) and DIP lender (N. Peterson) correspondence regarding notice and evaluation of asset disposal analysis.

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07/08/22	E. Smith	0.60	615.00	B130	Confer with counsel for Flagstar (J. Feldsher) and Dentons team (T. Moyron and others) regarding disposition of assets securing Flagstar warehouse credit facility (0.5); prepared correspondence with A. Helman regarding cash management data from FTI (0.1).
07/08/22	T. Moyron	1.10	869.00	B130	Meeting with TCB, Company, FTI, and Dentons re TCB's liquidation (.8); exchange correspondence regarding same (.3).
07/08/22	S. Maizel	0.80	776.00	B130	Telephone conference with TCB, etc. re pending loan disposition issues.
07/08/22	L. Macksoud	2.00	1,540.00	B130	Call with working group and Texas Capital re potential transaction (.8) follow up calls and emails with Dentons team re same (.7), confer with T. Moyron re Ginnie Mae issues (.5)
07/11/22	L. Harrison	2.00	2,280.00	B130	Confer with T. Moyron regarding course of action regarding meeting (.10); attend to review of emails from T. Moyron regarding counterparties approach to liquidation of collateral and review attached agreements regarding same (1.50); review follow up emails from C. O'Leary and T. Moyron regarding same (.40).
07/11/22	E. Smith	0.90	922.50	B130	Confer with A. samples, T. Ramm, T. Myron. C. Montgomery and C. O'Leary regarding proceed of collapsing GNMA pool. Reviewed JSACA for notice requirements.
07/11/22	E. Smith	1.00	1,025.00	B130	Confer with T. Moyron and S. Schrag regarding warehouse liquidity facility hedging, maintenance and pay down in the ordinary course when loans on the line are transferred for securitization or to loan traders.
07/12/22	E. Smith	0.60	615.00	B130	Confer with T. Moyron, C. Montgomery and L. Harrison regarding debtor involvement with warehouse provider collateral liquidations.

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Date	Timekeeper	Hours	Amount	Task	Narrative
07/12/22	E. Smith	1.20	1,230.00	B130	Review and prepare correspondence regarding identification of warehouse lines from which loans pooled for GSE or GNMA securitizations will be transferred and warehouse lender authorizations to proceed with sales of mortgage backed securities (0.4) and correspondence regarding warehouse provider rights to receive proceeds of sales of mortgage backed securities and mortgage loans (0.8).
07/12/22	E. Smith	0.30	307.50	B130	Confer with T. Moyron regarding loan sale strategy.
07/12/22	E. Smith	0.90	922.50	B130	Attend call with counsel for warehouse providers, including T. Kelly, counsel for Customers Bank, FGMC, T. Ramm, and Dentons team, including T. Moyron regarding MBS sales and cash collateral segregation.
07/12/22	L. Macksoud	1.30	1,001.00	B130	Calls and emails with Dentons working groups and various repo counter parties re asset disposition.

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Date	Timekeeper	Hours	Amount	Task	Narrative
07/12/22	L. Harrison	10.80	12,312.00	B130	Review email from T. Moyron regarding status of liquidation proposals and scheduling call regarding same (.30); confer with G. Medina regarding review of first day pleadings (.20); prep for zoom call with internal team regarding lender unwind proposal, including review of JSACA (.70); zoom call with C. Montgomery and T. Moyron regarding lender unwind proposal (.60); attend to review of lenders proposal and related issues and follow up with T. Moyron and C. Montgomery regarding same (1.00); MS Teams call with warehouse lenders and counsel including K. Ziman, J. Feldsher, T. Ramm, T. Moyron regarding GNMA securities disposition, other GSE securitizations and whole loan sales (.60); attend to review of proposal by lenders, including OCB, waiver and notice issues (1.50); phone call with C. Montgomery regarding Flagstar loan sale proceeds issues and draft emails regarding same (.80); attend to further review of lender proposal and related issues (3.00); confer with C. Montgomery regarding same (.40); attention to draft email to client regarding Flagstar and circulate same to C. Montgomery (.70); attention to status email to T. Moyron and C. Montgomery confirming initial findings of pertinent open issues regarding lenders proposal (1.00).
07/13/22	L. Macksoud	6.40	4,928.00	B130	Call with A. Helman re cash management issues (.5), multiple calls and emails with counsel to Rushmore as sub servicer, and working group regarding cash collateral issues (2.0), calls and emails with counsel to Flagstar and Customer's bank related to same (1.3), confer with G. Miller re critical vendor issues (.5), review Customer's emergency motion and confer with working group re same (1.1), further discussions of sale and plan process with Dentons and FTI teams (1.0).

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Date	Timekeeper	Hours	Amount	Task	Narrative
07/13/22	L. Harrison	7.80	8,892.00	B130	Review various emails re warehouse demands, including correspondence from Customer's bank and Rushmore (.70); follow up with C. Montgomery regarding draft email to client regarding Flagstar and JSACA (.10); review and circulate to T. Moyron and C. Montgomery updated analysis of various issues regarding waiver, post-petition transfers, notice of default and OCB related issues (.80); attend to call with Dorsey attorneys, T. Moyron, C. Montgomery, L. Macksoud, C. O'Leary regarding Rushmore related issues (.30); attend to issues raised by T. Moyron regarding OCB issues (1.30); attend to conference call with FTI and T. Moyron, C. Montgomery, L. Macksoud, C. O'Leary regarding status of potential sale of assets and related matters (.50); review and comment on draft letter to Rushmore regarding segregation issues (.40) further attention to OCB issues (2.00); prep and attention to call with L. Macksoud, T. Moyron and S. Schrag re potential sale options (.50); review email from L. Smith regarding Rushmore and TCB related issues (.40); attend to further review of draft emails to Rushmore with comments and follow up review of additional comments regarding same (.80).
07/13/22	E. Smith	0.30	307.50	B130	Attended call with counsel for Customers Bank, FTI, T. Meerovitch, debtor's Delaware co-counsel, the Pachulski firm, L. Davis Jones, and Dentons colleagues, T. Myron, regarding establishing agreement on segregation for the benefit of the warehouse providers, and direction of sale proceeds to those entities.
07/13/22	E. Smith	1.80	1,845.00	B130	Confer with J. Grebinar, Rushmore/Roosevelt (subservicer), and Dentons team, C. Montgomery, L. Macksoud and C. O'Leary, regarding servicer segregation and transfer of asset sale proceeds (0.6); review and revise call notes (0.1); prepare and revise draft confirmation requested by Rushmore (1.1).

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Date	Timekeeper	Hours	Amount	Task	Narrative
07/13/22	S. Schrag	0.30	195.00	B130	Call with T. Moyron, L. Macksoud, and L. Harrison regarding motion to sell outside ordinary course.
07/13/22	S. Schrag	0.30	195.00	B130	Confer with T. Moyron and L. Smith regarding loans and off take process.
07/13/22	T. Moyron	0.30	237.00	B130	All with L. Macksoud, S. Schrag, and L. Harrison regarding sale motion.
07/13/22	T. Moyron	0.50	395.00	B130	Attend to conference call with FTI and T. Moyron, C. Montgomery, L. Macksoud, C. O Leary regarding status of potential sale of assets and related matters.
07/13/22	T. Moyron	1.80	1,422.00	B130	Analyze K. Biron correspondence regarding segregation (.1) and analyze related issues regarding segregation, mechanics, and subservicer (1.2); correspond with A. Samples, et al., regarding communications with Rushmore (.4); correspond with counsel for TCB re Rushmore (.1).
07/14/22	L. Harrison	7.40	8,436.00	B130	Attend to latest developments regarding JSACA and segregation issues (.60); continue with review of OCB issues and draft and circulate email to T. Moyron summarizing findings to date (6.30); began to revisit FTI PowerPoint regarding comparing various sale scenarios (.50).
07/14/22	K.M. Howard	1.00	340.00	B130	Email exchanges with L. Harrison regarding motion seeking an order pursuant to section 105 confirming status of clearance advances (.1); research and assemble key documents and related orders (.6); finalize document pull (.2); prepare email to L. Harrison regarding same (.1).
07/14/22	E. Smith	0.40	410.00	B130	Reviewed and prepared correspondence regarding possible stay violation involving refusal to turn over mortgage loan files to repo buyer that owns the loans.
07/14/22	E. Smith	2.20	2,255.00	B130	Prepared directions to sub servicer to comply with asset segregation demands made by warehouse providers, and reviewed warehouse liquidity agreement enforcement rights (2.20).

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Date	Timekeeper	Hours	Amount	Task	Narrative
07/15/22	E. Smith	1.10	1,127.50	B130	Review documentation and correspondence relating to turn over of loan files for trades not to be completed with Angel Oak; attended all hands call with Angel Oak and eResi representatives, FGMC, A. Samples, FTI, T. Meerovitch, and Dentons team, T. Moyron and C. O'Leary regarding post-trade due diligence and true up, and return of loan files relating to trade that will not be completed.
07/15/22	E. Smith	1.20	1,230.00	B130	Reviewed and prepared correspondence regarding directions to subservicers to segregate warehouse provider cash collateral, and worked with FTI, J. Krasne and T. Meerovitch, to assemble summaries of loans currently on each warehouse line, and the servicer of such loans.
07/15/22	E. Smith	1.30	1,332.50	B130	Confer with FTI, W. Nolan and T. Meerovitch, and Dentons team, T. Moyron, L. Harrison and L. Macksoud, regarding servicing rights disposition options (0.9) ; reviewed draft offering summaries (0.4).
07/15/22	L. Harrison	5.60	6,384.00	B130	Confer with K. Howard regarding OCB and servicer issues (.50); continue with review of FTI info regarding sales and servicing issues (2.30); attend to call with T. Moyron, L. Smith, L. Macksoud, J. Krasne, T. Meerovich, and W. Nolan regarding MSR sale issues (.80); review course of action regarding preparation of sale motion regarding MSR interests and related matters (2.00).
07/15/22	T. Moyron	0.90	711.00	B130	Teams Meeting with FTI and Dentons re MSR sales, servicer, and related process.
07/15/22	L. Macksoud	3.40	2,618.00	B130	Calls and emails with Customers, Freddie and DIP lender to finalize stipulation and to resolve Customers motion (1.6), call with Dentons and FTI re MSR sale process (1.0), call with creditor re case status (.3), emails with A. Helman re cash management order (.3) and call with T. Moyron re same (.2).
07/15/22	T. Moyron	0.30	237.00	B130	Analyze email from J. Krasne and attached documents related to closed pipeline.

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07/16/22	L. Harrison	6.00	6,840.00	B130	Attend to review of MSR loans and related information (1.50); confer with L. Smith regarding MSR loans and draft summary regarding same (1.00); attend to initial outline of emergency sale motion regarding MSR loans (3.50).
07/16/22	E. Smith	2.60	2,665.00	B130	Notified subservicers BSI and SLS to follow collateral segregation and remittance instructions with respect to warehouse provider assets, and confirmed taking such action to counsel for warehouse providers.
07/16/22	E. Smith	0.20	205.00	B130	Confer with Lynn Harrison regarding marketing, buyer eligibility to purchase and disposal of loan servicing rights.
07/17/22	L. Harrison	6.50	7,410.00	B130	Attend to draft emergency motion regarding MSR sale (2.50); confer with T. Moyron and C. O'Leary regarding same (.50); call with T. Moyron regarding course of action, including review of emails from J. Krasne and T. Meerovich regarding same (.50); attend to draft emergency MSR motion (3.00).
07/17/22	T. Moyron	1.10	869.00	B130	Analyze matters related to MSR Sale Motion (.3); correspond with L. Harrison and C. O'Leary re same (.3); analyze propose language related to background and proposed sale re MSR (.3) and respond to same (.2).
07/17/22	C. Montgomery	0.20	242.00	B130	Communications with L. Harrison, C. O'Leary and T. Moyron regarding MSR sale issues (.2).
07/18/22	C. Montgomery	0.90	1,089.00	B130	MS Teams call T. Meerovich, T. Ramm, T. Moyron and others re MSR Servicing sale (.7) ; communications with EL Smith, T. Moyron N. Sombuntham regarding sales deck language change.
07/18/22	E. Smith	0.40	410.00	B130	Confer with T. Moyron, S. Maizel, C. Montgomery and L. Harrison regarding time line for MSR sale process.

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07/18/22	E. Smith	0.60	615.00	B130	Reviewed correspondence from subservicer regarding expected remittances to FGMC on behalf of warehouse providers (0.2) ; assisted treasury/cash management team with segregation of remittances into designated deposit accounts (0.40).
07/18/22	T. Moyron	3.60	2,844.00	B130	Analyze emails from FTI, S. Alberts, M. Caloway, et al. regarding terms of KERP/KEIP, motion, and related inquiries and responses and respond to same (1.3); analyze proposed changes, charts, and updated motion (.8); zoom meeting with FTI, S. Alberts re terms of KERP/KEIP, including PTO (1.5).
07/18/22	L. Harrison	7.70	8,778.00	B130	Attend to revisions to draft emergency motion regarding MSRs (2.00); attend to call with T. Moyron, C. Montgomery, T. Meerovich, J. Krasne, L. Smith, C. O'Leary regarding agency servicing sale process (.60); attend to further revisions to emergency motion (3.30); attend to review of various emails addressing segregation of accounts (.60); attend to call with T. Moyron, C. Montgomery, L. Smith regarding OCB issues and servicing sale process (.50); review course of action regarding emergency motion (.70).
07/18/22	T. Moyron	0.20	158.00	B130	Correspond with S. Schnabel regarding COC and order re Fannie.
07/18/22	T. Moyron	1.10	869.00	B130	Analyze power point presentation re Agency Servicing Sale Process (.2); Teams meeting with A. Samples, T. Ramm, FTI, L. Harrison et al. re Agency Servicing Sale Process (.7); calls with L. Smith (.1) and C. Montgomery re same (.1).
07/18/22	T. Moyron	0.70	553.00	B130	Analyze email from I. Lee re upcoming meeting (.1); Teams meeting with I. Lee, S. Hansberger, et al., re settlement issues, timeline, and potential bankruptcy inquiry (.6).
07/19/22	T. Moyron	0.20	158.00	B130	Conference call with L. Harrison regarding MSR sale process.

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07/19/22	T. Moyron	0.40	316.00	B130	Correspond with L. Harrison regarding sale motion (.1) and analyze issues related to motion to approve private sale of servicing rights (.3).
07/19/22	E. Smith	0.30	307.50	B130	Confer with C. Montgomery regarding treatment of loan buyer claim based upon failed trade.
07/19/22	L. Harrison	6.40	7,296.00	B130	Attend to draft MSR emergency motion (2.30); review emails regarding Customers fee issues (.30); attend to conference call regarding Customers/Rushmore fee issue with C. Montgomery, T. Moyron, L. Macksoud and S. Schrag (.50); continue with revisions to draft MSR motion and circulate same internally (2.50); review emails regarding GSE/SGMA pools (.20); review email from T. Moyron regarding Freddie assurances stipulation and follow up regarding same (.60) .
07/19/22	S. Schrag	0.30	195.00	B130	Confer with T. Ramm and T. Moyron regarding warehouse loans, collateral, and claims, plus equity and impact of agency approval on equity.
07/20/22	C. Montgomery	0.50	605.00	B130	Participate in Zoom call with T. Moyron, L. Harrison, E.L. Smith, L. Macksoud regarding MSR sale motion.
07/20/22	L. Harrison	5.80	6,612.00	B130	Review email from T. Moyron regarding review of draft Freddie Mac stipulation and course of action regarding same (.30); review language of draft Freddie Mac stipulation for standard provisions and follow up with T. Moyron regarding comments and related matters (1.80); review servicing sale materials describing MSR process (.60); attend to comparison of Freddie Mac stipulation for circulation to counsel (1.50); attend to conference call with T. Moyron, L. Smith, L. Macksoud and S. Maizel regarding status of MSR sale motion and course of action regarding same (.30); review course of action regarding preparations of supporting affidavit and order regarding MSR motion and follow up regarding same (1.30).

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07/20/22	E. Smith	0.60	615.00	B130	Attended call with FGMC, A. Samples, FTI, T. Meerovitch, and Dentons team, T. Moyron regarding subservicing rights.
07/20/22	E. Smith	0.20	205.00	B130	Confer with T. Moyron and L. Harrison regarding review of draft MSR sale motion.
07/20/22	S. Maizel	0.20	194.00	B130	Telephone conference with L. Harrison, etc. re motion to sell MSRs.
07/20/22	T. Moyron	0.80	632.00	B130	Analyze Servicing Sale Process deck and FNMA proposal deck (.2); correspond with N. Sombuntham re same (.2); prepare email to N. Peterman attaching decks (.1); and follow up correspondence with N. Peterman, FTI, et al., re same (.3).
07/20/22	T. Moyron	0.30	237.00	B130	Analyze issues related to motion to sale MSRs.
07/21/22	T. Moyron	1.40	1,106.00	B130	Analyze matters raised regarding sale and best procedure and process, timeline, updated sale motion, and related matters (1.2); analyze S. Schrag, et al. re emails (.2).
07/21/22	T. Moyron	1.10	869.00	B130	Analyze draft emergency motion for approval of sale of mortgage servicing rights (.8); correspondence with L. Smith, et al.; regarding further revision of MSR sale motion (0.3).
07/21/22	E. Smith	2.10	2,152.50	B130	Reviewed and revised draft emergency motion for approval of sale of mortgage servicing rights (1.8); reviewed and prepared correspondence with Dentons team colleagues including T. Moyron regarding further revision of MSR sale motion (0.3).

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Date	Timekeeper	Hours	Amount	Task	Narrative
07/21/22	L. Harrison	6.30	7,182.00	B130	Review comments from L. Smith and C. O'Leary to draft MSR motion (.70); attend to initial drafts of supporting MSR declaration and order regarding same (1.50); confer with T. Moyron regarding comments to latest draft of Freddie Mac assurances stipulation and course of action regarding MSR motion (.30); attend to incorporating comments into draft MSR motion and proofing same (2.30); draft and circulate internally points substantiating need for OCB protections (.80); further attention to draft MSR motion and forward same to T. Moyron (.70).
07/21/22	S. Maizel	0.40	388.00	B130	Zoom conference with FTI, etc. re warehouse line refinancing.
07/21/22	C. Montgomery	0.10	121.00	B130	Communications with L. Smith and L. Harrison regarding MSR sale motion (.1).
07/22/22	L. Harrison	4.10	4,674.00	B130	Forward draft MSR motion to FTI per T. Moyron direction (.30); confer with N. Sombuntham of FTI regarding status of Meerovich declaration and related matters (.40); review materials sent by N. Sombuntham regarding status of bidding process (.40); attend to draft Meerovich declaration (1.50); review recent opinion addressing 506 (c) related issues and circulate same to internal team (.50); attention to suggested edits to MSR motion to trim length and summarize pre-petition financial facilities (1.00).
07/22/22	T. Moyron	0.20	158.00	B130	Analyze matters related to MSR sale motion.
07/22/22	E. Smith	1.00	1,025.00	B130	Confer with FTI team, T. Meerovitch, and Dentons team, T. Moyron, regarding impact of TCB sales of loans on repo line on existing loan servicing and asset disposal work streams.
07/22/22	E. Smith	0.80	820.00	B130	Confer with FTI team, T. Meerovitch and T. Ramm, Dentons team, T. Moyron, and counsel for Barclays regarding issues with GNMA pooling of Barclays loans.
07/23/22	S. Maizel	1.30	1,261.00	B130	Drafting email to Ocwen re potential sale of MSR.

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Date	Timekeeper	Hours	Amount	Task	Narrative
07/23/22	L. Harrison	2.00	2,280.00	B130	Attend to draft Meerovich declaration and order regarding MSR private sale (1.50); review email from T. Moyron regarding request by W. Nolan regarding summary of MSR bankruptcy process (.20); circulate draft MSR sale motion, Meerovich declaration and order to internal team for review and comment (.30).
07/23/22	C. Montgomery	0.50	605.00	B130	Communications with C. O'Leary, L. Harrison, A. Helman regarding MSR sales and GNMA issues (.1); review decisions regarding section 306(g) of FHMACA (.4).
07/24/22	L. Harrison	1.00	1,140.00	B130	Review comments from L. Smith and C. O'Leary regarding MSR declaration (.30); incorporate comments from L. Smith and C. O'Leary regarding Meerovich MSR motion (.70).
07/25/22	T. Moyron	0.30	237.00	B130	Analyze matters related to MSR sale motion and declaration in support thereof.
07/25/22	T. Moyron	0.30	237.00	B130	Correspond with A. Samples, T. Ramm, et al. re loan sales.
07/25/22	C. Montgomery	0.20	242.00	B130	Communications with E.L. Smith and B. Oppenheimer regarding loan sale timing (.1) ; communications with L. Harrison regarding loan sale servicing (.1).
07/25/22	S. Maizel	0.50	485.00	B130	Review and revise Meerovich declaration in support of motion to sell MSR.
07/25/22	S. Maizel	0.40	388.00	B130	Review and revise memo re sale of Mortgage origination licenses.
07/25/22	L. Harrison	1.00	1,140.00	B130	Circulate revised draft Meerovich declaration in support of MSRs to L. Smith and C. O'Leary (.30); review comments from S. Maizel (.20); revised draft Meerovich declaration (.40); forward same to S. Maizel (.10).
07/26/22	T. Moyron	0.20	158.00	B130	Analyze T. Ramm, et al., emails re MSR bid.

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07/27/22	L. Harrison	2.30	2,622.00	B130	Attend to call with T. Meerovich and internal Dentons team regarding Freddie Mac, MSRs and related matters (.50); review course of action regarding MSR emergency motion and declaration in light of new information regarding bidding process and related matters (.80); review LOI from BSI Financial regarding MSR purchase (.80); follow up with internal team regarding same (.2).
07/27/22	S. Maizel	0.80	776.00	B130	Analyze issues related to potential sale of real estate licenses.
07/27/22	T. Moyron	0.70	553.00	B130	Analyze T. Ramm, A. Samples, et al. emails re MSR bid (.3); analyze same (.2); correspond with L. Harrison, et al., regarding same and next steps (.2).
07/27/22	T. Moyron	0.60	474.00	B130	Analyze email from A. Samples (.1); analyze letter from GNMA (.3); correspond with C. Montgomery, et al., re same (.2).
07/28/22	T. Moyron	1.20	948.00	B130	Analyze emails from T. Ramm and A. Samples re LOI (.2); call with C. O'Leary et al., regarding LOI and issues to be addressed (.5); analyze LOI and mark up (.2); prepare emails to T. Ramm, et al., regarding meeting to discuss LOI and respond to follow up emails (.3).
07/28/22	T. Moyron	0.50	395.00	B130	Zoom meeting with C. O'Leary, S. Maizel, et al., re LOI.

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Date	Timekeeper	Hours	Amount	Task	Narrative
07/28/22	L. Harrison	5.00	5,700.00	B130	Attend to revisions to emergency MSR motion (1.00); revisit BSI LOI in anticipation of call regarding same (.60); attend to extended call with T. Moyron, L. Smith, C. O'Leary, L. Mackoud, G. Miller and C. Montgomery regarding BSI LOI, Freddie Mac, and related matters (.70); forward draft emergency motion to G. Miller (.20); draft language for inclusion into LOI (.40); forward language to C. O'Leary for inclusion into LOI (.10); attend to call with G. Miller regarding emergency sale motion and Freddie Mac issues (.40); attend to follow up call with G. Miller and C. O'Leary regarding sale motion, call with FTI and FGMC regarding BSI and Freddie Mac issues (.90); review various comments and iterations of LOI regarding MSRs (.70).
07/28/22	E. Smith	1.10	1,127.50	B130	Initial red flag review of MSR purchase LOI and correspondence with Dentons team regarding issues.
07/28/22	E. Smith	1.80	1,845.00	B130	Confer with Dentons team, T. Moyron, C. O'Leary, S. Maizel regarding review of MSR purchase and sale LOI; revised LOI; review revised draft of MSR sale LOI; review and prepare correspondence regarding revisions to MSR sale LOI.
07/28/22	S. Maizel	0.70	679.00	B130	Zoom conference re sale of MSR with L. Smith, etc.
07/28/22	C. Montgomery	2.60	3,146.00	B130	Communications with C. O'Leary, L. Harrison re MSR sale(.1); participate in Zoom call with L. Harrison, T. Moyron re servicing rights LOI (.7); communications with M. Schmergele and S. Maizel regarding Ginnie Mae asset sale issues (1.5); communications with E.L. Smith, J. Krasne and C. Quian regarding pipeline sale closing (.3).
07/28/22	N. Mersky	1.30	1,163.50	B130	Reviewed FGMC MSR bid letter.
07/29/22	C. Montgomery	0.10	121.00	B130	Communications with T. Moyron regarding GNMA follow up from yesterday's call (.1).

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Date	Timekeeper	Hours	Amount	Task	Narrative
07/29/22	L. Harrison	2.60	2,964.00	B130	Review comments from C. O'Leary to BSI LOI (.40); review follow up email from T. Ramm of FGMC regarding comments from BSI regarding LOI (.40); attend to updating emergency motion, Meerovich declaration and proposed order regarding sale of MSRs (1.00); review emails between D. Oien and A. Samples regarding BSI LOI (.30); cursory review of Freddie Mac term sheet from G. Miller (.50).
07/29/22	T. Moyron	1.10	869.00	B130	Analyze T. Ramm, D. Oien, et al., re MSR bid, LOI, and related questions and updates (.4); analyze LOI and related issues (.7).
07/29/22	T. Moyron	2.60	2,054.00	B130	Participate in T. Meerovich preparation for DIP contested hearing.
07/30/22	L. Harrison	0.50	570.00	B130	Review emails between T. Ramm and D. Oien regarding BSI MSR bid.
	Subtotal	199.10	204,055.00		

B140 - Relief from Stay/Adequate Protection Proceedings

Date	Timekeeper	Hours	Amount	Task	Narrative
07/06/22	S. Maizel	0.80	776.00	B140	Zoom call with FTI, etc. re JVB demand on loans.
07/11/22	S. Schrag	0.60	390.00	B140	Review correspondence with S. Alberts, S. Maizel, and T. Moyron regarding notice of stay of bankruptcy (.1); confer with T. Moyron regarding the same (.1); confer with G. Medina regarding bankruptcy litigation notices (.2); correspond with J. John regarding the same (.2).
07/11/22	E. Smith	0.70	717.50	B140	Confer with counsel for warehouse provider, K. Ziman, regarding direction to subservicer to segregate collateral and remit cash collateral directly to warehouse provider; confer with Dentons team, T. Moyron, regarding response to requests from counsel for warehouse provider.

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Date	Timekeeper	Hours	Amount	Task	Narrative
07/12/22	S. Schrag	3.10	2,015.00	B140	Review correspondence between S. Alberts, S. Maizel, and T. Moyron regarding notices of bankruptcy (.3); review and analyze list of pending litigation provided by J. John (.9); confer with G. Medina regarding notices (.3); conduct research regarding stay and EEOC claims (.4); draft correspondence to J. John regarding the same (.4); conduct research regarding notices of bankruptcy (.8).
07/12/22	S. Schrag	1.70	1,105.00	B140	Review correspondence from D. Oien regarding vendors with executory contracts breaching contractual term by cutting services (.1); review contracts (.7); confer with general counsel at Xactus regarding access to services (.4); confer with C. Reeves regarding the same (.4); confer with T. Moyron regarding the same (.1).
07/13/22	S. Schrag	1.80	1,170.00	B140	Confer with C. Reeves regarding Xactus termination of access (.6); review underlying contracts for their terms (.7); confer with GC from Xactus regarding return of access (.5).
07/13/22	S. Schrag	1.20	780.00	B140	Correspond with J. John regarding notice of bankruptcy (.2); confer with G. Medina (.1); review correspondence from K. Sheehan (.1); review and revise notice (.3); confer with T. Moyron regarding the same (.2); confer with G. Medina regarding procedures for filing (.3).
07/14/22	S. Schrag	0.30	195.00	B140	Review correspondence from C. Casey from Xactus regarding full service (.1); confer with C. Reeves regarding Xactus (.2).
07/14/22	S. Schrag	0.50	325.00	B140	Confer with K. Howard regarding notices of bankruptcy (.2); review and revise notices of bankruptcy (.1); confer with T. Moyron regarding the same (.2).

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Date	Timekeeper	Hours	Amount	Task	Narrative
07/14/22	E. Smith	4.40	4,510.00	B140	Review and prepare correspondence regarding cash collateral motion; review and provide comments on revised draft of cash collateral stipulation (1.40); prepare correspondence with counsel for warehouse providers and with FGMC's sub servicer of mortgage loans, Rushmore, confirming direction of Rushmore to segregate collateral (2.20); distributed securities bid summaries to warehouse providers and conferred with FGMC, T. Ramm, and counsel for Texas Capital Bank, K. Ziman, regarding securities sales (0.80).
07/15/22	E. Smith	1.40	1,435.00	B140	Review Customers MRA Mortgage Loan definition in connection with objection of Freddie Mac objection to cash collateral stipulation between FGMC and Customers Bank and reviewed correspondence from Freddie and Customers regarding same (0.4); attend call with counsel for Customers, T. Kelly, Freddie Mac, O. Alaniz and FGMC legal team, T. Moyron and L. Davis Jones to address concerns of Freddie Mac with language in the stipulation(0.7); correspondence and calls with T. Moyron regarding Customers stipulation revisions and resolution of motion (0.3).
07/15/22	S. Schrag	4.80	3,120.00	B140	Confer with K. Howard regarding notices of bankruptcy (.6); review and revise notices for seven cases (1.5); draft notices for two cases (.6); confer with D. Lewis regarding filing (.2); confer with A. Yuengurt regarding filing (.2); confer with P. O'Connell regarding filing (.3); confer with C. Doherty regarding filing (.5); confer with N. Chauhan regarding filing (.3); confer with D. Paris regarding filing (.3); conduct research regarding the same (.3).

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Date	Timekeeper	Hours	Amount	Task	Narrative
07/18/22	A. Pendexter	1.00	680.00	B140	Confer with S. Schrag regarding notice of bankruptcy in Indiana state court (.3); review and revise notice of bankruptcy (.2); review and revise notice of appearance (.3); draft certificate of service for filings (.1); review local rules regarding procedural requirements for notice of bankruptcy (.1)
07/18/22	S. Schrag	3.20	2,080.00	B140	Confer with P. O'Connell regarding Notice of Bankruptcy in Wolter case (.1); revise the same (.2); confer with K. Howard regarding filing of the same (.2); confer with D. Lewis regarding filing in Texas state court (.1); confer with B. Hilton regarding notice in Georgia case and impact on sale of property (.2); conduct research regarding the same (.6); revise five notices (.9); confer with A. Pendexter regarding notice in Indiana state court (.6); confer with L. Anderson regarding notice in USDC EDTX (.3).
07/19/22	S. Schrag	0.20	130.00	B140	Confer with A. Yuengert regarding notice of stay.
07/20/22	C. Montgomery	1.10	1,331.00	B140	Communication with T. Moyron regarding TCB apparent post petition setoff and segregation request (.2); participate in zoom call with E.L. Smith S. Maizel and T. Moyron re same (.7); draft demand language directed to TCB and Communications with T. Moyron re same (.2).
07/24/22	E. Smith	1.30	1,332.50	B140	Review and revise Meerovitch declaration (0.7); review and prepare correspondence with FTI, T. Meerovitch, and Dentons team, T. Moyron, regarding loan sale proceeds segregation.
07/25/22	E. Smith	1.10	1,127.50	B140	Reviewed 559/lift stay motion and form of order filed by Customers Bank (0.7); reviewed and prepared correspondence with DENTONS team regarding response to motion (0.4).
07/25/22	T. Moyron	0.40	316.00	B140	Call with advisors for Flagstar and L. Macksoud re potential motion for relief from stay.

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Date	Timekeeper	Hours	Amount	Task	Narrative
07/26/22	S. Schrag	0.20	130.00	B140	Confer with B. Hilton regarding Georgia state case against FGMC re Partition and automatic stay.
07/27/22	S. Schrag	0.30	195.00	B140	Review correspondence from N. Burkett regarding Ciras and notice of bankruptcy.
07/28/22	S. Schrag	0.10	65.00	B140	Confer with B. Hilton and T. Daniel of AUSA's office regarding Georgia state partition case.
07/29/22	S. Schrag	0.60	390.00	B140	Confer with B. Hilton, A. Sandoval, and D. Coty regarding automatic stay and partition case in Georgia.
	Subtotal	30.80	24,315.50		

B150 - Meetings of and Communications with Creditors

Date	Timekeeper	Hours	Amount	Task	Narrative
07/05/22	J. Murphy	2.40	2,508.00	B150	Emails with Lindblom et al re sales of PIMCO loans to Barclays and rw DIP order re same.
07/05/22	J. Murphy	0.70	731.50	B150	Emails with Greenberg re side letter with DB on Pimco loans.
07/06/22	S. Maizel	0.30	291.00	B150	Review and respond to emails re discussions with GNMA and US DOJ.
07/06/22	S. Maizel	0.30	291.00	B150	Review and respond to emails re first day orders re cash flow DIP and REPO DIP.
07/11/22	T. Moyron	0.30	237.00	B150	Correspond with A. Samples, T. Meerovich, et al., re creditor matters.
07/14/22	C. Montgomery	0.10	121.00	B150	Communications with S. Maizel and T. Moyron regarding appointment of Committee.
07/17/22	C. Montgomery	0.10	121.00	B150	Communications with T. Moyron re creditors committee counsel selection (.1).
07/18/22	C. Montgomery	1.10	1,331.00	B150	Zoom call with Committee Counsel - R. Kelbon, M. Powers and M. Indelicato with S. Maizel, T. Moyron and L. Smith.
07/18/22	E. Smith	1.00	1,025.00	B150	Attended introductory counsel call with counsel for creditors committee (M. Indelicato and M. Powers) and Dentons team (S. Maizel, T. Moyron and C. Montgomery).

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Date	Timekeeper	Hours	Amount	Task	Narrative
07/18/22	S. Maizel	1.10	1,067.00	B150	Introductory call with counsel for the UCC re pending issues.
07/19/22	S. Maizel	0.60	582.00	B150	Conference call with Freddie Mac representatives, FTI, etc. re loan originations.
07/22/22	E. Smith	0.50	512.50	B150	Confer with counsel for creditors committee, M. Powers and M. Indelicato, and Dentons team, T. Moyron, regarding creditors committee counsel's overview of the proceeding and final financing.
07/22/22	S. Maizel	0.50	485.00	B150	Zoom conference with GNMA attorneys, etc. re pending issues.
07/22/22	S. Maizel	0.80	776.00	B150	Zoom conference with UCC advisors re pending issues.
07/22/22	C. Montgomery	0.50	605.00	B150	Participate in Zoom committee counsel call with M. Powers, M. Indelicato, T. Moyron, L. Macksoud re go forward considerations.
07/22/22	T. Moyron	0.80	632.00	B150	Conference call with Committee counsel, L. Jones, L. Smith, et al. re fundamental concerns, next steps, and other issues.
07/22/22	D. Cook	0.30	186.00	B150	Analysis concerning voicemail received from notice party regarding receipt of bankruptcy case materials.
07/24/22	T. Moyron	0.90	711.00	B150	Zoom meeting with Committee advisors, including M. Power, D. Galfus, regarding pipeline and other case issues.
07/24/22	C. Montgomery	1.00	1,210.00	B150	Zoom call with Committee Advisors including M. Indelicato, M. Powers, D. Galfus, J. Vizzini, regarding Pipeline, MSR sales, absence of GSE approvals (.9); phone call with T. Moyron regarding 506(c) follow up with Committee counsel (.1).
07/24/22	E. Smith	1.10	1,127.50	B150	Attended meeting among full unsecured creditors committee, FTI, T. Meerovitch, and Dentons, T. Moyron to hear questions from UCC counsel and FA.
07/25/22	C. Montgomery	1.50	1,815.00	B150	Preparation session for UCC meeting with T. Meerovich and others.
07/26/22	S. Maizel	0.50	485.00	B150	Zoom conference with UCC representatives, FTI, etc. re pending issues.

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Date	Timekeeper	Hours	Amount	Task	Narrative
07/26/22	S. Maizel	0.00	0.00	B150	Zoom conference with Freddie Mac representatives, G. Miller, etc. re MSR sale issues, etc.
07/26/22	S. Alberts	0.30	297.00	B150	Receive message from former employee (.1) call and answer questions from former employee J. Schultz (.2).
07/26/22	C. Montgomery	0.20	242.00	B150	Communications with T. Moyron and others regarding committee meeting (.1) ; review loan file information to be sent by the debtors and communications with T. Moyron and N. Sombuntham re same (.1).
07/27/22	C. Montgomery	2.10	2,541.00	B150	Preparation zoom call for committee meeting with T. Meerovich, T. Moyron, A. Samples, T. Ramm, S. Maizel and others (1.0); attend committee call (1.1).
07/27/22	T. Moyron	2.30	1,817.00	B150	Preparation meeting for Committee call with T. Meerovich, A. Samples, S. Maizel, et al. (1.0); zoom meeting with Committee members and advisors and FGMC and advisors (1.1); correspond with T. Meerovich re agenda for Committee meeting (.2).
07/27/22	T. Moyron	0.30	237.00	B150	Call with D. Galfus regarding Committee issues and information to be sent, including matters related to KERP/KEIP.
07/27/22	E. Smith	1.00	1,025.00	B150	Attended call between FGMC and advisors and UCC and advisors to discuss background to bankruptcy filing and where FGMC is today operationally.
07/27/22	S. Maizel	0.20	194.00	B150	Review and respond to emails from M. Dundon, Dundon Advisors, re issues related to qui tam relator questions.
07/27/22	S. Maizel	2.10	2,037.00	B150	Zoom conference with FTI, A. Samples, etc. in preparation for call with UCC (1.0); participate in zoom call with UCC and advisors, FTI, A. Samples, D. Oien, etc. re pending issues (1.1).
07/30/22	C. Montgomery	0.20	242.00	B150	Review settlement term sheet from Committee.
	Subtotal	25.10	25,482.50		

B160 - Fee/Employment Applications

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Date	Timekeeper	Hours	Amount	Task	Narrative
06/30/22	M. Zeefe	0.10	69.00	B160	Emails with M. Caloway re pro hac vice application.
07/05/22	S. Schrag	0.10	65.00	B160	Review correspondence regarding retention applications.
07/05/22	S. Maizel	0.50	485.00	B160	Drafting email re billing issues postpetition.
07/05/22	D. Cook	2.90	1,798.00	B160	Draft Dentons US Retention Application (2.9).
07/05/22	G. Medina	0.50	180.00	B160	Correspond with D. Cook regarding Dentons employment application and standard rates and retainer information (0.2); correspond with D. Grey on retainer and rates (0.2); correspond with P. Lipari regarding standard rates (0.1).
07/06/22	G. Medina	0.40	144.00	B160	Further correspondence with D. Cook and follow-up with T. Grey regarding retainer received in connection with preparation DUS Employment application.
07/06/22	T. Moyron	0.40	316.00	B160	Attention to employment application.
07/06/22	T. Moyron	0.60	474.00	B160	Analyze matters related to WARN (.4); and related S. Alberts, et al., correspondence (.2).
07/06/22	S. Maizel	0.90	873.00	B160	Review and revise Dentons employment application (.6); review and respond to emails re same (.3).
07/06/22	D. Cook	5.60	3,472.00	B160	Draft Dentons retention application (2.7); revise same in light of comments received from Dentons professionals (2.3); email communications with Dentons team regarding same (.6).
07/07/22	T. Moyron	0.10	79.00	B160	Prepare email to D. Oien re OCPs.
07/07/22	T. Moyron	0.40	316.00	B160	Analyze further PSZJ, FTI correspondence related to employment applications and various inquiries related thereto.

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07/07/22	D. Cook	7.90	4,898.00	B160	Analysis with respect to disclosure language in connection with Dentons retention application (1.1); email communications with Debtor team regarding Dentons retention application (1.4); revise Dentons retention application in light of needed edits (3.9); finalize same in preparation for filing (1.4); telephone conference with T Moyron regarding same (.1)
07/07/22	S. Maizel	0.70	679.00	B160	Review and revise Dentons employment application (.6); review and respond to emails re same. (.1).
07/14/22	T. Moyron	0.50	395.00	B160	Analyze emails from T. Cairns and T. Meerovich re motions to be filed and temporary employee (.3); analyze emails from S. Schrag re same (.2).
07/18/22	S. Schrag	1.50	975.00	B160	Reoccurring call with Dentons and FTI team to discuss outstanding items, including KEIP and KERP.
07/19/22	T. Moyron	0.20	158.00	B160	Correspond with M. Zeefe, et al., re final fee application.
07/20/22	S. Maizel	1.30	1,261.00	B160	Drafting response to US Trustee inquiry re Pillowtex analysis (.7); review and respond to emails re US Trustee inquiry re conflict checks (.6).
07/20/22	S. Maizel	0.20	194.00	B160	Review and respond to emails re Mosser v. FGMC.
07/21/22	S. Maizel	0.50	485.00	B160	Revising response to US Trustee re Dentons employment application.
07/25/22	S. Maizel	0.30	291.00	B160	Review and respond to emails from L. Jones re conflict check list (.2); review and respond to emails re Cox Communications on check list (.2).
07/25/22	S. Maizel	0.60	582.00	B160	Review and revise email response to B. Hackman, UST, questions re Dentons' employment application.
07/26/22	T. Moyron	0.10	79.00	B160	Analyze emails from T. Cairns, et al., re UST issues related to OCP motion and resolution thereof.

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Date	Timekeeper	Hours	Amount	Task	Narrative
07/28/22	S. Maizel	0.30	291.00	B160	Responding to emails from B. Hackman, UST, etc. re Dentons employment application issues.
07/28/22	S. Schrag	0.80	520.00	B160	Conduct research related to waiver and OCPs and Critical Vendors (.4); draft analysis of the same for J. John (.2); confer with J. John and T. Cairns regarding the same (.2).
07/29/22	S. Maizel	0.80	776.00	B160	Review and respond to emails re supplemental declaration re Dentons employment application (.4); drafting supplemental declaration re same (.4).
Subtotal		28.20	19,855.00		

B185 - Assumption/Rejection of Leases and Contracts

Date	Timekeeper	Hours	Amount	Task	Narrative
07/07/22	T. Moyron	0.20	158.00	B185	Confer with S. Schrag, et al., re leases.
07/07/22	S. Schrag	1.80	1,170.00	B185	Confer with C. Peoples, C. Reeves, J. John, and D. Oien regarding motion to reject leases (.7); confer with T. Moyron, FTI, and same FGMC people regarding motion to reject leases (.3); conduct research regarding the same (.8).
07/11/22	S. Schrag	0.70	455.00	B185	Confer with T. Moyron regarding rejection and abandonment motion (.2); review correspondence from C. Peoples regarding leases (.3); confer with C. Peoples regarding the same (.2).
07/12/22	T. Moyron	1.10	869.00	B185	Analyze Customers Bank demand to segregate accounts (.3) and analyze related issues (.2); prepare email to Company and FTI regarding same (.1); prepare email to counsel for Customers Bank regarding call to discuss (.1); correspond with L. Smith, et al., re same (.3); prepare email to Greenberg re same (.1).

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Date	Timekeeper	Hours	Amount	Task	Narrative
07/12/22	S. Schrag	1.30	845.00	B185	Confer with C. Peoples, M. A. Kaptain, and C. Reeves regarding rejection of leases (.5); review correspondence from C. Peoples regarding the revised list of leases (.2); call with C. Peoples regarding timing of motion to reject (.1); confer with C. Peoples as follow-up regarding options for notice of rejection (.5).
07/12/22	T. Moyron	0.20	158.00	B185	Analyze issues related to motion to reject leases.
07/14/22	S. Schrag	1.70	1,105.00	B185	Confer with C. Peoples regarding rejection and abandonment motion (.3); draft the same (1.4).
07/14/22	S. Schrag	2.70	1,755.00	B185	Confer with T. Moyron and Pachulski team regarding ordinary course professionals motion and 327 applications (.5); review correspondence from T. Cairns regarding the same (.3); call with J. John, T. Cairns, and T. Moyron regarding OCP motion (.5); continue drafting motion to reject (.9); review data regarding agreements (.5).
07/16/22	S. Schrag	1.90	1,235.00	B185	Revise motion to reject and abandon leases.
07/17/22	S. Schrag	3.60	2,340.00	B185	Revise motion to reject and abandon leases (3.4); call with T. Moyron regarding motion (.2).
07/19/22	S. Schrag	0.80	520.00	B185	Draft outstanding issues regarding rejection motion (.4); Confer with C. Peoples regarding outstanding questions on motion to reject (.4).
07/19/22	S. Schrag	0.70	455.00	B185	Review correspondence from C. Peoples regarding Draper lease issues (.3); review contractual language related thereto (.3); confer with C. Peoples regarding the same (.1).
07/19/22	T. Moyron	0.20	158.00	B185	Analyze correspondence from C. Peoples, et al. re lease matters.

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Date	Timekeeper	Hours	Amount	Task	Narrative
07/20/22	T. Moyron	0.90	711.00	B185	Attention to matters related to leases and payments (.3); correspond with B. Rost regarding outstanding postpetition payment (.2) and correspond with FGMC, et al., re same (.2); analyze S. Schrag emails regarding various issues related to landlords and leases (.2).
07/20/22	S. Schrag	2.60	1,690.00	B185	Prepare for meeting with C. Peoples to discuss leases (.2); confer with C. Peoples and C. Reeves regarding leases and motion to reject (.4); draft follow-up email related to the same (.2); confer with FTI (T. Meerovich, J. Krasne, B. Nolan), Dentons (S. Maizel), and J. John regarding leases and rejection motion (.3); conduct research regarding security deposits and priority thereof (1.2); conduct research regarding setoff (.3).
07/21/22	S. Schrag	2.20	1,430.00	B185	Conduct further research regarding security deposits and postpetition rents (1.3); draft analysis of the same (.4); confer with T. Moyron and S. Maizel (.2); confer with J. John and C. Peoples regarding narrative for rejection motion (.1); confer with G. Miller regarding the same (.1); confer with J. John and C. Peoples regarding the same (.1).
07/21/22	T. Moyron	0.30	237.00	B185	Analyze issues related to leases and deposits and next steps.
07/23/22	S. Schrag	0.70	455.00	B185	Continue drafting motion to rejection (.5); conduct research related to date of rejection in Delaware (.2).
07/24/22	S. Schrag	1.00	650.00	B185	Continue drafting motion to rejection (.7); conduct research related to date of rejection in Delaware (.3).
07/26/22	S. Schrag	0.20	130.00	B185	Review correspondence from C. Peoples and J. John regarding rejection motion and leases.
07/27/22	S. Maizel	0.10	97.00	B185	Review and respond to emails re motion to reject leases, list of leases, etc.

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Date	Timekeeper	Hours	Amount	Task	Narrative
07/27/22	S. Schrag	3.90	2,535.00	B185	Continue drafting rejection motion (2.9); confer with C. Peoples and J. John regarding the same (.2); review leases related to the same (.5); confer with D. Oien and J. John regarding list of leases (.2); confer with M.A. Kaptain and M. Hyland of FTI regarding data room (.1).
07/28/22	S. Schrag	10.10	6,565.00	B185	Continue drafting rejection motion (1.6); draft proposed order (1.1); draft notice of motion (.7); draft declaration in support thereof (1.8); prepare Schedule 1 of contracts to be rejected (1.4); confer with T. Moyron and S. Maizel regarding the same (.3); conduct research related to rejection date (1.4); review and revise the same to incorporate comments (1.8).
07/28/22	T. Moyron	0.20	158.00	B185	Analyze issues related to lease rejection.
07/28/22	S. Maizel	0.80	776.00	B185	Review and respond to emails re motion to reject real property leases (.4); revising motion to reject real property leases (.4).
07/29/22	S. Schrag	7.30	4,745.00	B185	Revise motion, order, declaration, Schedule 1, and notice to reject to incorporate changes from S. Maizel (2.1); confer with C. Peoples regarding the same (.3); incorporate suggested changes into the same (1.2); confer with I. Ortiz regarding the same (.2); confer with T. Cairns regarding the same (.2); incorporate suggested changes into the motion and Schedule 1 (2.1); conduct research regarding the same (.9); confer with S. Maizel regarding the same (.2); confer with D. Oien regarding the same (.1).
07/29/22	S. Alberts	0.30	297.00	B185	Review and comment on S. Smith consulting agreement.
07/29/22	S. Maizel	0.10	97.00	B185	Telephone conference with S. Schrag re application of automatic stay to foreclosure action in Georgia.
07/29/22	S. Maizel	0.40	388.00	B185	Review and revise motion to reject leases of real property.
	Subtotal	48.00	32,184.00		

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B190 - Other Contested Matters (excl. assumption/rejection motions)

Date	Timekeeper	Hours	Amount	Task	Narrative
06/30/22	D. Cook	3.50	2,170.00	B190	Analysis with respect to UST revisions to claims agent retention order (.4); communications with KCC regarding same (.2); communications with A Helman regarding same (.2); analysis with respect to claims agent retention fact issue raised by A Helman (.5); zoom conference with Dentons and PSZJ ahead of first day hearing (.3); prepare with respect to claims agent retention portion of First Day Hearing (1.9).
07/01/22	D. Cook	6.30	3,906.00	B190	Attend first day hearing (4.3); preparation in connection with potential questions pertaining to changes in claims agent retention order and scope of retention generally in connection with same (2.0).
07/01/22	S. Alberts	4.60	4,554.00	B190	Prepare for First Day hearing on wage motion (2.2), attend first day motion through wage motion (2.1), follow up (.3).
07/05/22	S. Alberts	1.00	990.00	B190	Review and consider WARN complaint and defenses thereto (.7), emails with co-counsel about defenses and next steps (.3).
07/06/22	D. Cook	3.20	1,984.00	B190	Research regarding recoupment as a defense to wage claims (1.6); telephone conference with C Doherty regarding same (.1); draft email memorandum for Dentons team review regarding same (.9); analyze Dentons team emails in connection with same (.6).
07/06/22	S. Alberts	1.80	1,782.00	B190	Review and assess WARN complaints (.5), communicate with co-counsel about WARN suits and next steps (.7), follow up drafting task list for suits and related issues (.6).
07/07/22	D. Cook	0.90	558.00	B190	Telephone conference with S Alberts regarding employment issues (.1); research with respect to insider status in connection with same (.6); email communications with S Alberts regarding same (.2).

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Date	Timekeeper	Hours	Amount	Task	Narrative
07/07/22	S. Alberts	3.50	3,465.00	B190	Receive and review legal authority on WARN related issues (2.1) and conference with client and others (1.0) and follow up regarding WARN notices, including review and approval of form (.4).
07/12/22	S. Alberts	0.20	198.00	B190	Review and comment on need for notice of stay for WARN suits.
07/13/22	S. Alberts	0.40	396.00	B190	Communicate about WARN litigation.
07/13/22	S. McCandless	0.40	394.00	B190	Communicate with S. Alberts regarding status and handling of pending WARN litigation.
07/20/22	S. McCandless	0.30	295.50	B190	Communicate with S. Alberts and T. Moyron regarding status of service of Buckley complaint and strategy for response to same.
07/20/22	S. Alberts	0.50	495.00	B190	Communicate about pending WARN litigation and need for meeting (.3) and follow up (.2).
07/21/22	S. Alberts	1.10	1,089.00	B190	Prepare for (.2) and conduct group call concerning WARN suits (.9).
07/21/22	S. McCandless	0.90	886.50	B190	Attend conference call with T. Moyron, S. Alberts, R. Heidenreich, and C. Doherty to discuss strategy for and handling of defense of WARN Act lawsuits (.90).
07/21/22	S. McCandless	0.30	295.50	B190	Communicate with T. Moyron and S. Alberts regarding service of WARN class action complaint in Buckley case filed in Delaware Bankruptcy Court. (.20); review T. Moyron's communications with counsel for Buckley (.10).
07/21/22	S. McCandless	1.50	1,477.50	B190	Review and analyze Buckley WARN Class Action Complaint filed in Delaware Bankruptcy Court to determine substantive arguments for answer and/or motion to be filed (defenses to WARN notice requirement and arguments for limiting class to employees reporting to Plano and laid off in late June) (.90) ; prepare and forward communication to T. Moyron, S. Alberts, and R. Heidenreich regarding same and in preparation for scheduled conference call (.60).

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07/22/22	D. Cook	3.10	1,922.00	B190	Research regarding scope of section 525 and use of same in bankruptcy proceedings.
07/25/22	S. Alberts	0.30	297.00	B190	Receive and respond to inquiry concerning WARN complaint (.2) and follow up (.1).
07/25/22	E. Smith	2.30	2,357.50	B190	Reviewed and discussed objections to DIP financing files by Unsecured Creditors Committee with FTI ,T. Meerovitch, and DENTONS , T. Moyron, teams.
07/25/22	S. Maizel	0.40	388.00	B190	Review and respond to emails re response to Customer's motion re 559.
07/25/22	S. McCandless	1.20	1,182.00	B190	Extended discussion with R. Heidenreich regarding to discuss strategy for defense of WARN Act Complaints and provide information on relevant background to employee layoffs, including WARN notices.
07/25/22	S. McCandless	0.70	689.50	B190	Provide instructions and information to J. Peterson for anticipated answer to Complaint following discussion with R. Heidenreich.
07/26/22	S. Alberts	0.20	198.00	B190	Internal communication about WARN claim litigation.
07/28/22	D. Cook	0.20	124.00	B190	Email communications with Dentons team regarding FCA claim.
07/29/22	D. Cook	0.60	372.00	B190	Zoom conference with S Maizel and C Mongtomery regarding FCA claim.
07/29/22	S. McCandless	0.90	886.50	B190	Conference call with R. Heidenreich, D. Marocco, and C. Doherty regarding strategy for defense of WARN cases, particularly Buckley case in Bankruptcy Court; provide related background information during same (.70); call with R. Heidenreich prior to and in preparation for conference call to provide update on facts known (.20).

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Date	Timekeeper	Hours	Amount	Task	Narrative
07/29/22	S. McCandless	1.30	1,280.50	B190	Review complaint in Eastern District of Texas WARN class action brought by J. Jackson for interrelationship with Buckley class action filed in Bankruptcy Court in which Jackson is named plaintiff (.40); review Wolter District of Nevada class action for interrelationship with Buckley class action (.50); research to determine Jackson's reporting relationship to Henderson, Nevada rather than Plano Texas for substantive defense that WARN notice not required for employees who did not report to Plano (.40).
07/29/22	S. Maizel	1.00	970.00	B190	Zoom conference with C. Montgomery and D. Cook re analysis of issues related to False Claims Act claims (.5); analyze treatment potential resolution of FCA claims (.5).
	Subtotal	42.60	35,603.00		

#### B200 - Operations

Date	Timekeeper	Hours	Amount	Task	Narrative
07/05/22	E. Smith	1.30	1,332.50	B200	Confer with T. Moyron, S. Maizel and other Dentons colleagues, T. Meerovich and J. Krasne, FTI, and A. Samples regarding wet funding on new warehouse line and existing warehouse line issues.
07/07/22	E. Smith	0.20	205.00	B200	Attended call between Dentons team, T. Myron, and FTI team, T. Meerovitch, regarding operating issues and pre-petition warehouse provider engagement during the course of today.
	Subtotal	1.50	1,537.50		

#### B210 - Business Operations

Date	Timekeeper	Hours	Amount	Task	Narrative
06/30/22	M. Zeefe	0.50	345.00	B210	Review UST comments to utilities motion and emails with T. Cairns re same (0.2); emails and call with J. John re hearing preparation re same (0.3).

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Date	Timekeeper	Hours	Amount	Task	Narrative
07/01/22	S. Schrag	0.40	260.00	B210	Review correspondence regarding agreement with Freddie (.3); confer with their counsel regarding the same (.1).
07/01/22	S. Maizel	0.50	485.00	B210	Telephone conference with D. Oien, A. Samples, W. Nolan, etc. re issues with Rushmore, loan servicer.
07/05/22	J. Murphy	1.70	1,776.50	B210	Emails with client (Lindblom) re 300+ claims letters at DB re correspondence loans (1.7 hrs).
07/05/22	E. Smith	1.20	1,230.00	B210	Reviewed and prepared correspondence with T. Myron, S. Maizel and other Dentons colleagues regarding impediments to loan origination, including readiness of document custodian, viability of work arounds and today's process for originations and offtake by new warehouse repo buyer of the loans.
07/06/22	S. Schrag	0.90	585.00	B210	Review correspondence related to funding pipeline (.2); confer with T. Moyron regarding the same (.2); confer with A. Samples regarding execution of signature pages for bank accounts (.3); confer with R. Bloch regarding the same (.1); confer with R. Bloch, B. Oppenheimer, T. Moyron regarding executed signature pages for DACA (.1).
07/06/22	J. Murphy	1.10	1,149.50	B210	Revise draft email to DB re corresp loans. (1.1 hrs).
07/06/22	J. Murphy	1.20	1,254.00	B210	Attention to emails with partners re excess proceeds from repo closeouts (1.2 hrs).
07/07/22	S. Schrag	1.10	715.00	B210	Review ordinary course professionals motion (.5); confer with D. Oien regarding list of ordinary course of professionals and procedures (.3); review correspondence from and confer with T. Moyron regarding the same (.3).
07/07/22	E. Smith	0.30	307.50	B210	Attended call with counsel for agency and GSE purchasers of FGMC loans to discuss continuation of such purchases.

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07/08/22	E. Smith	1.40	1,435.00	B210	Attended call with PIMCO, M. Schwarzman, FGMC, A. Samples and D. Oien, FTI, T. Meerovitch, and Dentons team, including T. Myron regarding financing needs for operating activities.
07/08/22	S. Schrag	0.80	520.00	B210	Correspond with D. Oien, J. John, T. Moyron, and S. Maizel regarding call to discuss ordinary course professionals (.3); confer with J. John regarding chief information security officer (.2); confer with T. Moyron regarding the same (.1); revise schedule to motion (.1); review and revise motion (.1).
07/11/22	S. Schrag	0.80	520.00	B210	Review correspondence regarding securities (.4); call with C. Montgomery, L. Smith, T. Moyron, C. O'Leary (.4).
07/11/22	E. Smith	1.40	1,435.00	B210	Confer with FTI team, T. Meerovitch, FGMC, A. Sample, and Dentons team, T. Moyron, regarding DIP budget, loan fundings, loan servicing and facilitation of asset sales by warehouse providers.
07/11/22	T. Moyron	0.30	237.00	B210	Analyze emails from J. McKay, et al., re cash management.
07/12/22	E. Smith	1.80	1,845.00	B210	Review of asset disposal, and cash management work streams and next steps with Dentons, T. Moyron, and FTI, T. Meerovitch, teams.
07/12/22	R. Richards	0.30	282.00	B210	Review supplemental critical vendor chart and e-mails regarding questions on the chart.
07/12/22	R. Richards	0.70	658.00	B210	Call with FTI, client and Miller on critical vendor chart.
07/12/22	R. Richards	1.10	1,034.00	B210	Portion of FTI/Dentons team status call.
07/12/22	T. Moyron	0.40	316.00	B210	Analyze matters related to critical vendor motion, additional list, and filing mechanics (.3); and correspond with G. Miller re same (.1).
07/13/22	R. Richards	0.30	282.00	B210	Emails regarding Rushmore critical vendor and related analysis.
07/13/22	T. Moyron	0.30	237.00	B210	Attend to matters related to critical vendors.

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Date	Timekeeper	Hours	Amount	Task	Narrative
07/18/22	T. Moyron	0.40	316.00	B210	Analyze emails from M. Turkel, et al., re ACH Prefunding for Payroll.
07/18/22	T. Moyron	0.30	237.00	B210	Analyze emails from T. Ramm, et al., re Today's Trade and related details.
07/18/22	T. Moyron	0.10	79.00	B210	Analyze email from Rushmore's counsel J. Grebinar re Notice of Liquidation from TCB.
07/18/22	E. Smith	0.50	512.50	B210	Attend call with FGMC, D. Oien, Buckley Firm, J. Naimon, and Dentons team, S. Maizel and T. Moyron to discuss reorg plan ideas.
07/18/22	R. Richards	0.20	188.00	B210	Emails regarding critical vendor issue with Synergy Technical.
07/18/22	T. Moyron	0.30	237.00	B210	Analyze J. John, et al., emails regarding cash management and various account matters.
07/19/22	T. Moyron	0.40	316.00	B210	Conference call with L. Smith and T. Meerovich re Rushmore.
07/19/22	T. Moyron	0.80	632.00	B210	Correspond with L. Macksoud regarding final cash management order (.2); analyze emails from A. Samples, et al., re Signature Bank accounts (.1); analyze issues related to TCB account and funds (.2); call with FTI, A. Samples, C. Montgomery, et al. re Fannie LLPAs and TCB Deposit (.4).
07/19/22	T. Moyron	1.40	1,106.00	B210	Analyze emails from counsel for Customers regarding segregation of funds, orders, etc. (.2); analyze matters related to warehouse lenders including settled GSE/GNMA securities, segregation of funds, and account mechanics (.8); conference call with T. Ramm re settled securities (.2) and analyze emails from T. Ramm re trades, TCB, Angel Oak (.2).
07/19/22	T. Moyron	0.50	395.00	B210	Correspond with L. Lerman from DOJ re extension of deadline (.1); analyze email from M. Jacobson attaching documents and responding to GNMA/FHA questions (.2); prepare email to L. Lerman re same (.1); exchange emails with C. Montgomery re request for side letter and see follow up emails with Hunton (.2).

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Date	Timekeeper	Hours	Amount	Task	Narrative
07/20/22	T. Moyron	0.30	237.00	B210	Analyze email from S. Lindbloom, et al., re critical vendor payments.
07/20/22	T. Moyron	0.40	316.00	B210	Analyze new proposed changes to Freddie stipulation (.2); correspond with L. Harrison re same (.2).
07/20/22	T. Moyron	0.80	632.00	B210	Analyze further emails from H. Hyland re TCB (.2); review excel chart and tabs regarding TCB accounts and wires and remittances (.2); prepare correspondence to counsel for TCB (.3); analyze correspondence from counsel for TCB and respond to same (.1).
07/20/22	T. Moyron	2.20	1,738.00	B210	Call with T. Meerovich, A. Samples, C. Montgomery, et al., regarding TCB and amounts swept (.2); Zoom meeting with C. Montgomery, L. Smith, et al., regarding TCB sweeps/set off and next steps (1.0); analyze issues related to set off, Code, accounts and funds at issue (.8); further correspond with FTI regarding information needed re same (.2).
07/20/22	T. Moyron	0.30	237.00	B210	Analyze critical vendor payments and related issues.
07/20/22	T. Moyron	0.60	474.00	B210	Correspond with N. Sombuntham regarding FNMA deck and call regarding same (.2); analyze emails from A. Samples, T. Meerovich, et al. re changes (.2); analyze updated deck (.2).
07/21/22	R. Richards	1.00	940.00	B210	Participate in critical vendor status update call (0.8); review updated critical vendor spreadsheet (0.2).
07/22/22	T. Moyron	0.20	158.00	B210	Analyze email from M. Jacobson re cash management motion update and exhibits.
07/22/22	E. Smith	0.70	717.50	B210	Participated in FTI team, T. Meerovitch, and Dentons team, T. Moyron, review of financing and asset disposal work streams.
07/25/22	E. Smith	0.70	717.50	B210	Attended work stream planning call with FTI team, T. Meerovitch, and Dentons team, T. Moyron.
07/25/22	T. Moyron	0.10	79.00	B210	Correspond with G. Miller re critical vendor objection from Committee.

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Date	Timekeeper	Hours	Amount	Task	Narrative
07/26/22	T. Moyron	0.30	237.00	B210	Participate in Teams meeting with G. Miller, M. Kaptain, et al., re critical vendor motion.
07/26/22	T. Moyron	0.20	158.00	B210	Analyze emails from J. Grebinar, et al., reconcile data and requested reporting.
07/27/22	S. Schrag	0.20	130.00	B210	Call with J. John regarding ordinary course professionals and critical vendors.
07/28/22	T. Moyron	0.10	79.00	B210	Correspond with M. Kaptain re cash management.
07/29/22	R. Richards	0.60	564.00	B210	Call with client, FTI and Geoff Miller regarding critical vendors (0.5), follow up emails (0.1).
07/29/22	T. Moyron	0.20	158.00	B210	Correspond with T. Meerovich, A. Samples, and D. Oien re MBFRF Q2 2022.
07/29/22	E. Smith	0.70	717.50	B210	Reviewed client questions regarding prepetition warehouse provider notices and prepared correspondence with counsel for warehouse provider.
	Subtotal	33.00	29,216.50		

B220 - Employee Benefits/Pension

Date	Timekeeper	Hours	Amount	Task	Narrative
06/30/22	M. Zeefe	1.10	759.00	B220	Review and finalize employee wage motion (0.9); calls with G. Medina re same (0.1); call with C. Doherty re same (0.1).
07/01/22	S. Schrag	0.10	65.00	B220	Confer with T. Moyron regarding KERP and KEIP issues.
07/02/22	C. Doherty, Jr.	0.20	139.00	B220	Call with T. Moyron regarding KEIP and KERP prep work.
07/03/22	C. Doherty, Jr.	1.70	1,181.50	B220	Research and review forms for KEIP and KERP Motion (.9); prepare analysis regarding WARN complaint (.8).
07/04/22	C. Doherty, Jr.	0.70	486.50	B220	Research for forms and precedent for KEIP and KERP motion.

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07/05/22	C. Doherty, Jr.	3.50	2,432.50	B220	Call with client and professionals regarding KEIP and KERP (.8); prepare form of KEIP and KERP Motion (1.5); prepare list of data questions for company for KEIP & KERP (.2); call with M. Hyland regarding data for KEIP & KERP (.1); professions call with FTI and Dentons, including S. Alberts regarding KEIP and KERP planning (.7); review and respond to emails regarding employment litigation issues (.2).
07/05/22	T. Moyron	1.30	1,027.00	B220	Call with FTI, A. Samples, M. Caloway, S. Alberts, et al., re KERP/KEIP (1.0); correspond with C. Doherty, et al., re same (.3).
07/05/22	S. McCandless	0.20	197.00	B220	Review S. Alberts and T. Moyron communications regarding drafting of KERP and KEIP.
07/06/22	S. McCandless	0.70	689.50	B220	Review second of two pending WARN class actions (Wolter) (.40); provide initial comments to Dentons team on same (.30).
07/06/22	S. McCandless	1.20	1,182.00	B220	Initial research regarding allowability of obtaining release of WARN claims in return for KEIP/KERP benefits (.80); report to Dentons team regarding same (.40).
07/06/22	S. McCandless	0.40	394.00	B220	Communicate with S. Alberts and C. Doherty regarding recommended timing of obtaining release of WARN claims in return for KEIP/KERP benefits.
07/06/22	S. McCandless	0.50	492.50	B220	Review detailed to do list received from S. Alberts regarding KERP/KEIP and pre-petition WARN suits (.20); consider and respond with comments on strategy for defense of WARN suits (.30).
07/06/22	C. Doherty, Jr.	2.50	1,737.50	B220	Prepare KEIP and KERP Motion (.5); attend call regarding WARN issues with S. McCandless & S. Alberts (.5); review and respond to emails regarding Wage Motion service (.1); prepare analysis regarding legal issues for formulation of KEIP and KERP agreements (1.1); call with D. Cook regarding research project for WARN (.1); call with D. Imhoff regarding KEIP and KERP (.1); review email analysis of S. McCandless regarding WARN issues (.1).

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07/06/22	S. Alberts	2.50	2,475.00	B220	Communicate with client, review contract of L. Day and provide assessment of severance issue (.3); communicate with C. Doherty about KEIP and KERP issues (.3), conference with FTI and working group (.8) and follow up regarding issues for further research, calls and emails (.7); communications about service of Wage order and final hearing (.4).
07/07/22	S. McCandless	2.50	2,462.50	B220	Review and analyze case law involving potential waiver of WARN claims by employees who receive KEIP/KERP benefits: Messer v. Bristol, Local Union 1992 v. Okonite, Allen v. Sybase (2.20); communicate with C. Doherty regarding same (.30).
07/07/22	S. McCandless	0.80	788.00	B220	Zoom meeting with FTI and S. Alberts regarding pending KEIP/KERP matters and strategy for moving forward.
07/07/22	S. McCandless	0.40	394.00	B220	Communicate with S. Alberts and D. Cook regarding potential bankruptcy defenses to WARN claims related to payment of severance pay.
07/07/22	S. McCandless	1.10	1,083.50	B220	Provide background information to S. Alberts and C. Doherty for analysis of potential request for waiver of WARN claims in return for KEIP/KERP payments and timing of same (.60); further review and describe Messer case for same (.50).
07/07/22	S. McCandless	0.50	492.50	B220	Second of two 7-7 conference calls with FTI and S. Alberts to discuss KEIP/KERP analysis and strategy.
07/07/22	C. Doherty, Jr.	5.10	3,544.50	B220	Draft analysis of legal issues regarding KEIP and KERP and employee issues (.4); call with S. Alberts regarding KEIP and KERP (.1); Teams Call with company regarding employee issues (.9); prepare draft of KEIP & KERP Motion (2.8) ; call with M. Proctor regarding KEIP and KERP (.2); professionals call with FTI and Dentons regarding KEIP and KERP term sheet (.5); call with S. McCandless regarding employee issues (.2).

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07/07/22	S. Alberts	3.50	3,465.00	B220	Communications about KEIP and KERP issues (.4), review and follow up on research points, including insider case authority (1.4) receive and comment on KEIP/KERP deck (.5), conference with FTI and internally about KEIP and KERP (.9) and follow up (.3).
07/08/22	C. Doherty, Jr.	4.00	2,780.00	B220	Prepare KEIP/KERP Motion (3.3); call with M. Jacobson regarding Wage motion question (.1); review and respond to emails regarding wage motion (.1); labor call with S. McCandless and S. Maizel (.3); prepare email regarding employment suits against company (.2).
07/08/22	S. Alberts	3.00	2,970.00	B220	Conference with FTI about KERP and KEIP issues (.5), follow up call with M. Jacobson about Wage motion (.1), review (.6) and comment (.7) on KEIP/KERP Motion and conference about KEIP and KERP with C. Doherty (.2), conference with C. S. McCandless, S. Maizel and others about labor issues (.3) and follow up with S. Maizel (.2) and with FTI (.4).
07/08/22	S. McCandless	1.10	1,083.50	B220	Conference call with S. Alberts and C. Doherty regarding interrelationship between KERP and KEIP and WARN entitlements (.30); review KERP and KEIP analysis received from M. Hyland to prepare for same (.80).
07/11/22	S. McCandless	0.70	689.50	B220	Conference call to discuss KERP/KEIP status, strategy, and handling and related employment matters (with clients, FTI, and Dentons team).
07/11/22	S. Schrag	0.50	325.00	B220	Call re KEIP/KERP issues with D. Oien, T. Moyron, S. McCandless, S. Alberts, FTI team, and A. Samples.
07/11/22	C. Doherty, Jr.	2.40	1,668.00	B220	(.7) Professionals KERP/KEIP Call with FTI & Dentons, joined by A. Samples for part of call ; call with company and FTI regarding KERP/KEIP (.7); review and respond to emails regarding employee issues (.3); research precedent for KEIP and KERP Motion (.6); call with S. Alberts regarding KEIP KERP Motion (.1).

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Date	Timekeeper	Hours	Amount	Task	Narrative
07/12/22	C. Doherty, Jr.	3.50	2,432.50	B220	Prepare KEIP/KERP Motion (2.9); review and respond to emails regarding KEIP & KERP and employee issues (.5); analyze draft of talking points (.1).
07/12/22	S. Alberts	3.90	3,861.00	B220	Communications about employee notice issues (.4), review and provide comments to KEIP and KERP motion papers (3.5).
07/12/22	S. McCandless	2.30	2,265.50	B220	Review and analyze KERP/KEIP talking points received from R. Chesley (.40); review and analyze S. Alberts' proposed changes to same (.40); provide comments to S. Alberts for further revisions to same and reasons for same in context of WARN requirements (.70); related review of first draft of KERP/KEIP motion received from C. Doherty (.80).
07/13/22	S. McCandless	0.60	591.00	B220	Provide revised KERP/KEIP talking points to FTI and Dentons team taking WARN requirements into account.
07/13/22	C. Doherty, Jr.	6.90	4,795.50	B220	Prepare KEIP/KERP Motion and supporting declarations (5.5); review and respond to emails regarding KEIP & KERP and employee issues (.8); prepare analysis regarding legal research regarding procedural issue for adversary case (.3); call with Dentons professionals regarding KEIP and KERP (.3).
07/13/22	C. Montgomery	0.20	242.00	B220	Communications with T. Moyron, S. Alberts and S. McCandless regarding KERP/KEIP and WARN notices.
07/13/22	S. Schrag	0.30	195.00	B220	Confer with T. Moyron regarding KEIP and KERP.
07/13/22	S. Alberts	6.80	6,732.00	B220	Multiple zoom conferences internally and with FTI about KEIP and KERP and WARN issues and notices (3.0); review and respond to emails re same (1.0); analyze and revise materials to employees on deadlines and other related materials (2.8).
07/13/22	S. McCandless	0.40	394.00	B220	Further communicate with Dentons team regarding provision of WARN notices in context of KERP and related matters.

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Date	Timekeeper	Hours	Amount	Task	Narrative
07/13/22	S. McCandless	1.00	985.00	B220	Review 7-13 version of talking points for KERP and related matters received from R. Chesley (.30); draft and provide alternative wording to FTI and Dentons teams (.70).
07/13/22	S. McCandless	0.40	394.00	B220	Dentons conference call to discuss bankruptcy background to KERP/KEIP talking points.
07/13/22	S. McCandless	0.70	689.50	B220	Communicate with S. Alberts regarding KERP/KEIP talking points as related to WARN requirements; further related review of current version of talking points.
07/13/22	S. McCandless	1.10	1,083.50	B220	Provide relevant and detailed background information on WARN requirements to Dentons team working on revising FTI employee talking points for employee announcement of KERP and related matters (.80); review and analyze response from T. Moyron (.30).
07/14/22	S. Alberts	5.70	5,643.00	B220	Review and provide comments to revised KEIP/KERP papers (3.0), follow up calls and revisions to KEIP and KERP materials and WARN claims (2.7).
07/14/22	C. Doherty, Jr.	12.40	8,618.00	B220	Prepare KEIP/KERP Motion and supporting declarations (8.6); review and respond to emails regarding KEIP & KERP and employee issues (1.8); calls with FTI and Dentons, and Pachulski professionals regarding gathering and confirming facts and language for KEIP and KERP motion and updating information regarding Board comments, including calls with M. Hyland and M. Proctor (1.8); perform legal research regarding KEIP and KERP development (.2).
07/14/22	S. Schrag	0.20	130.00	B220	Participate in call with T. Moyron and FTI (W. Nolan, D. Imhoff, T. Meerovich, M. Hyland) to discuss the KEIP/KERP.
07/14/22	S. McCandless	0.20	197.00	B220	Communicate with R. Chesley and S. Alberts regarding updated KERP/KEIP talking points.
07/14/22	S. McCandless	0.80	788.00	B220	Conference call with clients and FTI to discuss interrelationship of KERP and WARN.

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Date	Timekeeper	Hours	Amount	Task	Narrative
07/14/22	S. McCandless	0.50	492.50	B220	Review report from C. Doherty regarding details of KERP/KEIP and outstanding issues (.30); review S. Alberts' responses to same (.20).
07/15/22	S. McCandless	0.30	295.50	B220	Communicate with Dentons bankruptcy team regarding timing of filing of KEIP/KERP motion and relationship to provision to employees of WARN notices.
07/15/22	C. Doherty, Jr.	6.80	4,726.00	B220	Prepare KEIP/KERP Motion and supporting declarations (2.0); review and respond to emails regarding KEIP & KERP and employee issues (1.0); perform legal research and analysis regarding DIP Lender questions and comments (.6); draft analysis of legal research for preparation of calls with DIP Lender regarding KEIP & KERP (.8); attention to emails from S. Schrag regarding filing of notices of bankruptcy (.2); calls with professional team regarding KEIP & KERP and implementation and strategy (1.5); prepare comments to motion to shorten time for KEIP/KERP motion (.2); perform research regarding motion to shorten time for KEIP/KERP motion (.5).
07/15/22	S. Alberts	5.10	5,049.00	B220	Communicate internally about warn issues as well as KERP and KEIP programs and papers (.7), pre-call (.2) and call Lender (.9) and follow up review of certain contracts and other issues to assess severance and related calculation (3.3).
07/16/22	S. Alberts	1.60	1,584.00	B220	Communicate with co-counsel about need communications with employees about impending KERP and KEIP programs (.1) and draft communication (1.2) and follow up (.3).
07/16/22	C. Doherty, Jr.	0.20	139.00	B220	Attention to and analyze emails regarding KEIP and KERP issues.
07/16/22	S. McCandless	1.00	985.00	B220	Review S. Alberts' new draft of notice to employees re KERP (.60); respond to S. Alberts regarding proposed change to same (.20); review response from R. Chesley (.10); further communicate with S. Alberts regarding same (.10).

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Date	Timekeeper	Hours	Amount	Task	Narrative
07/17/22	S. McCandless	0.80	788.00	B220	Review C. Doherty's comments on KERP talking points and S. Albert's response to same (.30); respond to same (.20); communications regarding further revisions to same (.30).
07/17/22	S. McCandless	0.20	197.00	B220	Review updated KERP talking points following conference call.
07/17/22	C. Doherty, Jr.	3.40	2,363.00	B220	Prepare KEIP/KERP Motion and supporting declarations (1.2); call with professionals from FTI, PSZJ and Dentons regarding KEIP & KERP matters (1.1); call with client and professionals regarding employee matters and strategy for week (1.1).
07/17/22	S. Alberts	2.00	1,980.00	B220	Conference with client and certain professionals about KERP, KEIP and WARN issues (1.1), conference with lenders about same (.7) and follow up (.2).
07/18/22	S. Alberts	10.50	10,395.00	B220	Work on KEIP and KERP pleadings and materials, including employee communications, and extensive calls with FTI and co-counsel (9.1); work on WARN notices (1.4).
07/18/22	C. Montgomery	0.80	968.00	B220	Review KEIP/KERP motion re pipeline discussion (.4); participate in KERP/KEIP discussion via MS Teams with S. Alberts, T. Meerovich (.4).
07/18/22	C. Doherty, Jr.	11.20	7,784.00	B220	Prepare KEIP and KERP Motion and supporting papers (6.1) ; review and respond to emails regarding KEIP and KERP project (1.4); calls with professional teams and client regarding KEIP KERP motion and strategy (afternoon client and professional call (1.4); evening professional team call (1.5); calls with team member regarding gathering information (.6) ; prepare comments to motion to shorten time; analyze motion to shorten time (.2).

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Date	Timekeeper	Hours	Amount	Task	Narrative
07/19/22	C. Doherty, Jr.	11.20	7,784.00	B220	Prepare KEIP and KERP Motion and supporting papers (3.8) ; review and respond to emails regarding KEIP and KERP project (1.3); calls with professional teams and client regarding KEIP KERP motion and strategy (read-through call with S. Alberts (1.5); call with M. Hyland (.1); follow-up read through call with S. Alberts (.2); calls with T. Moyron (.2)).
07/19/22	S. Schrag	0.90	585.00	B220	Call with N. Peterman, T. Moyron, S. Alberts, M. Schwarzmann regarding KERP.
07/19/22	S. Alberts	10.70	10,593.00	B220	Draft and circulate inserts for brief (.6), receive revised brief, conduct final review and spot checking of KEIP/KERP briefing (2.1), conference with C. Doherty about modifications (1.2), calls and efforts to finalize KEIP and KERP pleadings, including review and comments to revisions to Motion, Declarations in Support, Motion to Seal and Motion to Shorten time and otherwise aided in preparing filing (6.8).
07/20/22	S. Schrag	0.60	390.00	B220	Confer with S. Alberts regarding KERP and KEIP and Board approvals.
07/20/22	C. Doherty, Jr.	0.40	278.00	B220	Review and respond to emails regarding filed KEIP/KERP Motion and Motion to Shorten Time and strategy regarding same.
07/20/22	S. Alberts	1.90	1,881.00	B220	Confer with T. Moyron about early morning filings and next steps including preparing for potential hearing on Motion to Shorten Time re: KEIP and KERP (.2), prepared for hearing, including review of UST objection (.8), communicate with local counsel about Court's request for order (.1), receive order shortening time and follow up communication (.2), communications about sharing non redacted KEIP and KERP materials with UCC and possibility of NDA (.4), communicate with counsel to PIMCO about KERP and KEIP filing and follow up with T. Moyron (.2).
07/21/22	R. Heidenreich	1.50	1,395.00	B220	Background reading on issues arising out of bankruptcy filings and WARN Act notices; meeting with S. Alberts, T. Moyron and defense team on background and next steps in WARN Act litigation.

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Date	Timekeeper	Hours	Amount	Task	Narrative
07/21/22	C. Doherty, Jr.	1.30	903.50	B220	Call with S. Alberts, T. Moyron and labor attorneys regarding WARN adversary and strategy (.8); review and respond to emails regarding labor issues (.5).
07/22/22	C. Doherty, Jr.	0.30	208.50	B220	Review and respond to emails re labor issues and interplay with bankruptcy code.
07/22/22	S. Alberts	1.10	1,089.00	B220	Receive inquiry concerning Mr. Querrey and KEIP (.1), follow up with FTI (.2), initial follow up with client (.1) assess issues and review his contract (.4), provide assessment to A. Sample (.3).
07/25/22	S. Alberts	1.60	1,584.00	B220	Receive and review draft presentation slide deck to UCC and provide comments thereto (.4), receive inquiry from A. Sample about KEIP structure and respond (.1) and follow up with FTI (.2), and Dentons (.3), communication about potential areas of inquiry to address about KEIP and KERP (.6).
07/25/22	C. Doherty, Jr.	0.60	417.00	B220	Review and respond to emails re Wage Motion and employee issues (.4); analyze objection filed by UCC to Wage Motion (.2).
07/25/22	R. Heidenreich	2.50	2,325.00	B220	Review complaints, First Day Declaration, WARN Act letters, case law and regulations, and develop ideas for fact investigation and potential defense strategy; confer with S. McCandless on background of letters and potential strategy.

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Date	Timekeeper	Hours	Amount	Task	Narrative
07/26/22	S. Alberts	6.20	6,138.00	B220	Review UCC's limited objection to Wage motion (.2), forward questions in order to respond thereto (.2), work with FTI in formulating answers to UCC's questions (.2), receive and considered UST's questions as to KERP and KEIP (.7) and draft response (.3) and circulate internally (.1) and to FTI with questions (.2); CW D. Imhoff about KEIP KERP issues (.3), arrange call with company (.2) and conference with Company about certain KEIP, KERP and related issues (.7), communicate with C. Doherty about KEIP, KERP and employee issues (.4), assess and provide assessment of Mr. Querrey matter (.4), conference with PSZJ and T. Moyron about certain wage, KEIP and KERP issues (.9), review KERP and KEIP research in light of certain raised questions by parties in interest and considered responses (1.4).
07/26/22	R. Heidenreich	0.50	465.00	B220	Coordinate defense team meeting; telephone conference with S. McCandless regarding draft answer and defenses.
07/27/22	S. Alberts	6.40	6,336.00	B220	Conference with T. Moyron about KEIP and KERP and witness preparation (.4), work with FTI about providing UCC information including specific objections (.5), conference with company about certain KEIP, KERP issues (.5); request (.2) obtain and review (1.1) and revise and expand response to UST KERP/KEIP inquiry and modified draft response (.6) and send to client (.1), conference with PSZJ about KEIP and KERP hearing and potential objections and evidence and testimony (1.0), Emails (.2) and conference with S. McCandless about lay-offs and terminations (.3); conference with FTI about wage priority issue (.4), conference with S. Maizel and T. Moyron about upcoming employment related hearings (.5), receive (.1) respond (.1) to company inquiry regarding pre v. postpetition commission payments; receive and review certain employment agreement to verify indemnity issue (.4).

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Date	Timekeeper	Hours	Amount	Task	Narrative
07/27/22	G. Medina	1.00	360.00	B220	Assisted S. Alberts with FTI Data Room per his request (0.1); correspond with S. Alberts and C. Doherty regarding employment agreement requested (0.2); retrieve and send KEIP/KERP Motion and additional information pulled from the data room and send to S. Alberts (0.5); correspond with M. Kaptain (FTI) regarding assistance in locating agreement for S. Alberts (0.2).
07/27/22	R. Richards	0.20	188.00	B220	Emails regarding US Trustee D&O questions.
07/28/22	S. Alberts	3.00	2,970.00	B220	Communicate about Mr. Querrey and other employees (.2), Communicate with T. Moyron about wage issues (.3), Receive call and conference with D. Galfus about KERP and KEIP (.3), conference with PSZJ about KERP and KEIP in preparation of Tuesday hearing (1.0), conference with company about witness preparation and Tuesday hearing (.7), receive inquiry, assess and respond to inquiry from company on KERP and KEIP (.5).
07/29/22	R. Heidenreich	1.20	1,116.00	B220	Telephone conference with S. McCandless regarding strategy, information about work locations and whether included in WARN notice; telephone conference with litigation defense team regarding strategy for defense and class certification.
07/29/22	C. Doherty, Jr.	1.70	1,181.50	B220	Prepare for WARN call with litigation team (.3); attend WARN call with S. McCandless and R. Heidenreich (.6); review and respond to emails regarding KEIP and KERP and Wage Motion, including regarding providing information to resolve objections (.5); review Wage Motion and KEIP/KERP Motion to refresh and prepare regarding hearing and for possible objections (.3).
07/29/22	S. Alberts	0.50	495.00	B220	Emails about (.1) and provide proposed resolution for KERP plan and circulate (.2), communicate about information disclosure to UCC under POE restriction (.2).

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Date	Timekeeper	Hours	Amount	Task	Narrative
07/30/22	S. Alberts	0.30	297.00	B220	Communicate about employees receiving compensation within and above 507(a)(4) cap.
07/30/22	C. Doherty, Jr.	1.40	973.00	B220	Call regarding KEIP/KERP motion with T. Moyron, L. Jones and FTI team (.3); prepare supplemental declaration regarding KEIP/KERP motion (.9); review and respond to emails regarding KEIP/KERP motion and Wage motion (.2).
07/31/22	C. Doherty, Jr.	0.50	347.50	B220	Prepare informational email in response to UST questions (.2); call with T. Moyron regarding KERP/KEIP motion (.1); review and respond to emails regarding Wage Motion and KEIP/KERP motion (.2).
07/31/22	S. Alberts	0.50	495.00	B220	Communicate about KEIP and KERP resolution with UCC (.1) and communications about Mr. Querrey (.4).
Subtotal		192.00	163,581.50		

B230 - Financing/Cash Collections

Date	Timekeeper	Hours	Amount	Task	Narrative
06/30/22	T. Moyron	5.20	4,108.00	B230	Conference and correspondence with Greenberg, Dentons, UST, counsel for GECs, et al., regarding motions, DIP, changes, and comments (2.9); confer with L. Smith, et al., regarding cash collateral adequate protection for Flagstar (.5); correspond with L Smith and Lauren Macksoud re DIP financing motion at first day hearing (0.9); zoom call M. Schwarzman, T. Meerovich, T. Moyron, P. Partee and others regarding intercreditor issues (.5); zoom call re DIP Budget with T. Meerovich and C. Montgomery(.4). 2
06/30/22	D. Cook	8.60	5,332.00	B230	Revise Meerovich declaration ISO DIP motions (2.7); analysis of same in order to finalize (2.2); analysis with regard to DIP materials in order to reach agreement (2.2); analysis with respect to email communications with professional team regarding DIP financing (.9); telephone conferences with T Moyron regarding DIP Financing (.6).

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Date	Timekeeper	Hours	Amount	Task	Narrative
06/30/22	C. Montgomery	2.80	3,388.00	B230	Phone conference with L. Macksoud re DIP hearing (.6); phone call T. Moyron re filing issues (.3); phone call A. Helman regarding custodial issues (.3); review Deutsche Bank correspondence on DIP Motion(.1); review UST correspondence re DIP motion (.5); zoom call with Hinton and Greenberg, Dentons and Pachulski regarding UST issues (.5); begin preparations for hearing(.5).
06/30/22	S. Alberts	0.80	792.00	B230	Review and consider WARN actions.
06/30/22	T. Moyron	2.70	2,133.00	B230	Conference calls, meetings, and correspondence regarding Barclays repo facility and documents and filing.
06/30/22	C. Montgomery	3.40	4,114.00	B230	Drafting and review of changes to Barclays DIP Order (2.1);phone call with T. Moyron and Others regarding Barclays facility ( .4); zoom call M. Schwarzman, T. Meerovich, T. Moyron, P. Partee and others regarding intercreditor issues (.5); zoom call re DIP Budget with T. Meerovich and T. Moyron (.4).
06/30/22	C. O'Leary	7.50	6,375.00	B230	Review/analyze revised Barclays DIP MRA and PSL and exchange correspondence re: the same (2.6); exchange correspondence re: financing agreements and first day motions (0.6); review/analyze DBNTC Custodial Agreement and DACA and exchange correspondence re: the same (0.8); review/analyze Servicer Notice and exchange correspondence re: the same (0.6); preparation of closing deliverables for Barclays DIP MRA facility and exchange correspondence re: the same (2.2); review/analyze default demand letter from TCB's counsel and exchange correspondence re: the same (0.7).

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Date	Timekeeper	Hours	Amount	Task	Narrative
07/01/22	C. O'Leary	5.60	4,760.00	B230	Telephone Conference GT (DIP Cash Flow Lender counsel) re: Cash Flow DIP closing deliverables (0.6); Telephone Conference Hunton (Barclays counsel) re: MRA closing deliverables (0.6); preparation of closing deliverables for Cash Flow DIP and DIP Repo facilities and exchange correspondence re: the same (2.2); office conference JCN re: office conference and deliverables (0.4); review/analyze final MRA and program documents and exchange correspondence re: the same (1.2); review/analyze final cash flow credit agreement and loan agreements and exchange correspondence re: the same (0.6).
07/01/22	C. Montgomery	9.50	11,495.00	B230	Continued preparations for Repo Motion and responses to UST (2.0); participate in morning phone call with UST office and Barclays counsel regarding the Repo DIP (.6); continuing preparations for hearing including attention to DIP Repo Order (1.4); participate in First Day hearings including communications during caucus breaks on settlement of issues, filing addition exhibits to DIP Repo Motion and further changes to orders (5.5).
07/01/22	J. Nelson	4.90	3,332.00	B230	Prepare draft Officer's Certificate (3.7); review organizational documents (1.2).
07/01/22	G. Medina	0.40	144.00	B230	Retrieve and send at the request of S. Maizel the First Day and DIP declaration in preparation for hearing.
07/01/22	S. Schrag	2.60	1,690.00	B230	Confer with A. Samples regarding execution of approvals for DIPs (.4); confer with B. Trinidad regarding the same (.2); prepare further documents in support of execution for DIP (.4); confer with T. Moyron regarding the same (.3); confer with Greenberg counsel regarding execution of approvals for DIP (.3); confer with T. Moyron regarding the same (.2); confer with C. O'Leary regarding execution of approvals for Incumbency and Certificates (.3); prepare the same for execution (.4); confer with A. Samples regarding the same (.1).

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07/01/22	D. Cook	1.60	992.00	B230	Analyze current Repo DIP materials in support of Dentons team Repo DIP presentation at first day hearing (1.1); analysis regarding current Cash Flow DIP Term Sheet at request of T Moyron (.5).
07/01/22	T. Moyron	0.10	79.00	B230	Correspond with S. Maizel, et al., re TCB.
07/01/22	T. Moyron	0.40	316.00	B230	Correspond with Hunton, Greenberg, Reed Smith, et al., re Fannie serving rights and language in orders.
07/01/22	T. Moyron	0.20	158.00	B230	Correspond with GT, FTI, et al., re budget.
07/01/22	T. Moyron	0.20	158.00	B230	Correspond with GT, A. Samples, et al., re signature to term loan agreement and note.
07/01/22	T. Moyron	0.20	158.00	B230	Exchange emails with L. Smith re TCB requests.
07/01/22	T. Moyron	2.80	2,212.00	B230	Analyze correspondence from C. O'Leary, FGMC, T. Meerovich, lenders, et al., and analyze related issues re finalization of financing orders, transaction documents and close financing arrangements, funding and accounts, and related issues.
07/01/22	T. Moyron	0.20	158.00	B230	Correspond regarding Rushmore with T. Meerovich, et al.
07/01/22	T. Moyron	0.80	632.00	B230	Analyze final version of DIP term sheet and related issues in connection with various inquiries raised.
07/01/22	T. Moyron	0.20	158.00	B230	Analyze M. Schwarzmann, T. Meerovich correspondence re budget, cash flow, etc.
07/01/22	S. Maizel	0.70	679.00	B230	Telephone conference with FTI, A. Samples, etc. re pipeline funding issues.
07/01/22	T. Moyron	0.20	158.00	B230	Correspond with GT, Hunton, Dentons re repo DIP order.
07/01/22	T. Moyron	0.20	158.00	B230	Correspond with PSZJ, Hunton, et al., re motion to seal.
07/02/22	C. O'Leary	1.10	935.00	B230	Exchange correspondence re: MSR transfer to Planet Mortgage and DIP Orders (0.7); exchange correspondence re: Custodial Agreement mechanics and trust receipt issues (0.4).

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07/03/22	C. O'Leary	0.20	170.00	B230	Exchanging correspondence re: Barclays funding CPs and Goldman hedge agreement.
07/04/22	T. Moyron	0.60	474.00	B230	Analyze email from B. Oppenheimer, et al. re DACAs.
07/05/22	T. Moyron	1.10	869.00	B230	Lead call with L. Smith, S. Maizel and other Dentons colleagues, L. Jones, Pachulski, and T. Meerovich and J. Krasne, FTI to review July 5th issues and solutions, and planning for issues in lending, staffing, bankruptcy case administration and loan sale work streams.
07/05/22	T. Moyron	0.80	632.00	B230	Correspondence with L. Smith, S. Maizel and other Dentons colleagues regarding impediments to loan origination, including readiness of document custodian, viability of work arounds and today's process for originations and offtake by new warehouse repo buyer of the loans.
07/05/22	T. Moyron	0.90	711.00	B230	Analyze D. Baruch, et al., correspondence and documents regarding TCB items.
07/05/22	T. Moyron	0.30	237.00	B230	Analyze emails from R. Bloch, et al., re Signature Bank accounts and DACAs.
07/05/22	T. Moyron	0.60	474.00	B230	Analyze correspondence from S. Daily, et al., re MSFTA, KYPC process, and related issues.
07/05/22	C. O'Leary	1.60	1,360.00	B230	Preparation of revised Officer's Certificate and exchange correspondence re: the same (0.8); review/analyze A&R Articles of Incorporation and related deliverables and exchange correspondence re: the same (0.8).
07/05/22	C. O'Leary	3.20	2,720.00	B230	Exchange correspondence re: JVB and TCB facilities (1.6); Plan/prepare for/conduct telephone conference with FTI and FGMC re: JVB facility status and upcoming monthly roll / maturity dates (0.8); Plan/prepare for/conduct telephone conference with P. Weiss (JVB's counsel) re: JVB facility status and upcoming monthly roll / maturity dates (0.8).

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07/05/22	C. O'Leary	2.70	2,295.00	B230	Exchange correspondence re: Planet MSR transactions (0.9); Review/analyze Planet PSAs and exchange correspondence re: the same (0.9); Plan/prepare for/conduct telephone conference with Planet's counsel re: PSAs and upcoming transfer transactions (0.9).
07/05/22	C. O'Leary	3.40	2,890.00	B230	Plan/prepare for/conduct office conference with T. Moyron, S. Maizel re: asset disposition and related issues in connection with pre-petition repo facilities (0.8); review/analyze TCB portfolio details and exchange correspondence re: the same (0.8); telephone conference with FTI, T. Moyron, and L. Macksoud re: pre-petition financing facilities and related information requests and exchange correspondence re: the same (1.8).
07/05/22	T. Moyron	1.00	790.00	B230	Zoom meetings with S. Maizel, C. O'Leary, and L. Jones re JVB and next steps and related matters.
07/05/22	T. Moyron	0.60	474.00	B230	Call with counsel for JVB, C. O'Leary regarding inquiries and requests (.3); correspond with Company, FTI, et al., re same and TCB requests (.3).
07/05/22	S. Alberts	1.40	1,386.00	B230	Discussion with client and FTI regarding KEIP and KERP structure and timing (1.0), follow up review and revise list of documents (.2); Communicate about consultant status (.2).

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07/05/22	C. Montgomery	4.20	5,082.00	B230	Communications with T. Moyron regarding JVB and Zoom call with P. Siddiqui re same (.4); communications with T. Moyron and N. Peterman regarding funding without Signature Bank DACA (.1); review servicing agreements (.2); zoom call with T Moyron, C. O'Leary, E.L. Smith, J. Murphy , S. Maizel, regarding prepetition MRA roll over issues(1.0); review precent on MRA rollover (.2); review bailee letters (.5); review Morgan Stanley MSFTA termination notice (.1); review MFSTA termination provisions (.3); communications with T. Moyron and J. Murphy re same (.1); prepare for and participate in FTI status update call including T. Moyron, T. Meerovich, A. Samples and E.L. Smith (1.3).
07/05/22	S. Maizel	0.30	291.00	B230	Review and respond to emails re Joint Marketing Agreement Status, etc.
07/05/22	S. Maizel	1.10	1,067.00	B230	Zoom call with DIP Lenders, FTI, etc. re DIP financing (.7); review and respond to emails re same (.4).
07/05/22	S. Maizel	1.10	1,067.00	B230	Zoom call with PSZJ, Lee Smith, etc. re JVB demands, TCB demands, etc. (.8); review and respond to emails re same (.3).
07/05/22	T. Moyron	1.60	1,264.00	B230	Conference call with PIMCO representative re accounts, DACAs and related issues (.5); correspond with Signature Bank, et al., re DACAs (.8); correspond with N. Peterman re Signature Bank affiliations (.1) and call with L. Macksoud re same (.1) and email to Signature Bank re same (.1).
07/05/22	T. Moyron	0.60	474.00	B230	Analyze matters related to Cash Flow DIP and Repo Orders (.3); conference call (.1) and correspond with L. Macksoud regarding language in Cash Flow and DIP Repo orders (.1); prepare email to N. Peterman regarding language in same (.1).
07/05/22	T. Moyron	1.40	1,106.00	B230	Analyze matters related to JVB, Planet, TCB, and correspond with C. Montgomery, et al. re same.
07/05/22	J. Murphy	0.60	627.00	B230	Attention to emails with partners re Morg Stan MSFTA claims.

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07/06/22	C. Montgomery	4.50	5,445.00	B230	Communications with C. O'Leary regarding Pimco refinancing (.1); communications with J. Murphy and C. O'Leary regarding Deutsch Bank custody accounts (.1); communications with N. Peterman and R. Bloch regarding Signature Bank DACA (.1); communications with C. O'Leary regarding Texas Capital Bank discussions and review TCB MRA re Same (.2); review hedge position data (.3); MS Teams call with T. Moyron, C. O'Leary and A. Samples regarding JVB windup and TCB pricing( .7); DACA communications with A Helman and B. Oppenheimer (.1); review TCB Warehouse agreement (.5); review GSE Warehouse and GNMA recently settled pool schedule (.3); communications with C. O'Leary regarding notice of default (.1); review termination and default remedies under TCB Warehouse Agreement (.4); draft proposed responses to J. Krasne Questions (.2); communications with T. Moyron re meeting to discuss same (.1); catchup zoom call regarding JVB and other loan sale issues with FTI and Dentons (1.3).
07/06/22	G. Medina	0.40	144.00	B230	Review docket and retrieve certification of counsel filed along with attached Redline versions of Cash Flow Dip Order and DIP REPO Order and send to S. Maizel.
07/06/22	E. Smith	0.30	307.50	B230	Confer with B. Oppenheimer, counsel for operating DIP credit facility lender, and FTI team, including T. Meerovitch, regarding lending mechanics for first advances under the facility;
07/06/22	S. Maizel	0.70	679.00	B230	Zoom call with FTI, etc. re JVB demand on loans.
07/06/22	T. Moyron	1.80	1,422.00	B230	Zoom meeting with FTI, Company, and Dentons regarding JVB and then continued meeting with FTI and Dentons re potential sale process and related matters.

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07/06/22	E. Smith	1.40	1,435.00	B230	Reviewed revised drafts of Signature Bank deposit account control agreement (DACA), prepared summary of open items for T. Moyron and A. Helman, and corresponded with counsel for secured lender regarding final terms of DACA.
07/06/22	E. Smith	1.40	1,435.00	B230	Reviewed correspondence with T. Moyron and C. O'Leary regarding loan sale opportunities and transaction structures and conferred with counsel for pre-petition bridge lender (B. Oppenheimer) regarding sale of resi loans originated with bridge loan proceeds.
07/06/22	T. Moyron	0.50	395.00	B230	Zoom meeting with A. Helman, et al., regarding Bailee letter exemplars.
07/06/22	T. Moyron	0.30	237.00	B230	Conference call with L. Smith re call with Greenberg, loan funding, and related matters.
07/06/22	T. Moyron	0.60	474.00	B230	Correspond with R. Bloch, Greenberg, et al., regarding DACAs and analyze related documents (.6); correspond with A. Samples, re signatures (.2).
07/06/22	T. Moyron	0.40	316.00	B230	Correspond with R. Block, Greenberg, et al., re DACAs.
07/06/22	T. Moyron	0.30	237.00	B230	Analyze emails from C. O'Leary, J. Murphy re FGMC action items and financing facilities.
07/06/22	T. Moyron	0.30	237.00	B230	Correspond with A. Samples, C. O'Leary re correspondents and approval required.
07/06/22	C. O'Leary	3.90	3,315.00	B230	Plan/prepare for/conduct telephone conference TCB and Paul Weiss re: exit options and potential portfolio sales (1.3); Exchange correspondence re: return of correspondent collateral files and pipeline fundings (2.6).

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07/06/22	C. O'Leary	2.60	2,210.00	B230	Plan/prepare for/conduct telephone conference with FTI and FAGMC re: JVB facility and maturity date/potential roll (0.9); telephone conference with Katten re: JVB financing facility (0.4); Preparation of form notice re: preservation of value in the assets subject to repurchase facility (0.8); telephone conference with Rosenthal re: release of collateral at DBNTC (0.4).
07/06/22	C. O'Leary	4.20	3,570.00	B230	Office conference with Andrew Hellman re: release of collateral from DBNTC (0.4); Plan/prepare for/conduct telephone conference with T. Moyron and L. Smith re: DBNTC collateral issues and JVB liquidation options (1.9); Plan/prepare for/conduct telephone conference with T. Moyron, L. Smith, A. Samples and FTI re: JVB and TCB facilities (1.9).
07/06/22	C. O'Leary	1.50	1,275.00	B230	Review/analyze UCC-1s in connection with Barclays DIP financing facility and exchange correspondence re: the same (0.3); Exchange correspondence re: Notice of Default and Angel Oak and Planet Home inquiries (1.2).
07/06/22	T. Moyron	1.30	1,027.00	B230	Analyze matters related to TCB, Customers, JVB, and GSEs (.7); Analyze C. O'Leary emails and attachments re default letters (.2); Call with C. Montgomery re team organization (.3); correspond with C. Montgomery re TCB (.1).
07/07/22	T. Moyron	0.50	395.00	B230	Correspond with L. Smith, et al., regarding warehouse loan sale option analysis (.2) ; Correspond with C. Montgomery re matters related to Freddie and FNMA (.3).
07/07/22	T. Moyron	0.20	158.00	B230	Conference call with L. Macksoud re pending issues.
07/07/22	C. O'Leary	1.80	1,530.00	B230	Plan, prepare for/conduct TC Reed Smith (Freddie's counsel) re: MSR portfolio and future servicing of loans (1.1); Plan/prepare for/conduct TC HUD/GNMA re: MSR portfolio and future delivery of loans (0.7).

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07/07/22	C. O'Leary	1.60	1,360.00	B230	Plan/prepare for/conduct TC Paul Weiss (TCB's counsel) re: sale process and portfolio liquidation and exchange correspondence re: the same (0.8); OC T. Moyron and L. Smith re: sale process and portfolio liquidations (0.8).
07/07/22	C. O'Leary	2.60	2,210.00	B230	Review/analyze default notices and exchange correspondence re: the same (1.6); Plan/prepare for/conduct office conference with T. Moyron and L. Macksoud re: liquidation damages (0.6); Exchange correspondence re: financing facilities and servicing portfolios (0.4).
07/07/22	S. Schrag	0.40	260.00	B230	Review correspondence regarding finalizing DACA (.3); confer with A. Samples regarding the same (.1).
07/07/22	S. Schrag	0.40	260.00	B230	Review and analyze correspondence between Dentons (A. Helman), FGMC (J. John), and FTI (M.A. Kaptain) related to credit cards and various orders related thereto.
07/07/22	T. Moyron	0.90	711.00	B230	Call with K. Zinger, Company, FTI, Dentons et al. re process and coordination re TCB (.5); call with T. Kelly, J. Feldsher, FTI, Company, etc. regarding process and coordination re Customers (.4).
07/07/22	T. Moyron	0.30	237.00	B230	Analyze email from T. Rhamm re GNMA pools (.1); conference call with T. Meerovich re same (.2).
07/07/22	T. Moyron	0.10	79.00	B230	Analyze emails from M. Schwarmann and T. Meerovich re scheduling of calls re DIP Order.
07/07/22	T. Moyron	0.70	553.00	B230	Analyze issues related to requests from warehouse lenders, section 559, and liquidation and facilitation of collateral.
07/07/22	T. Moyron	0.60	474.00	B230	Call with counsel for Fannie, FTI and Dentons re questions, next steps, and Debtor's request for all hands on call.
07/07/22	T. Moyron	0.60	474.00	B230	Zoom meeting with Dentons and PSZJ re warehouse lender and process.
07/07/22	T. Moyron	0.30	237.00	B230	Conference call with T. Kelly, et al., re Customers and pending issues.

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07/07/22	T. Moyron	0.50	395.00	B230	Zoom meeting with Dentons re TCB and pending matters.
07/07/22	T. Moyron	0.70	553.00	B230	Zoom meeting with counsel for Freddie re stipulation and discussion regarding plan and next time (.4); correspond with A. Samples re same and related GSE matters (.2); prepare email to S. Warren re Fannie discussion (.1).
07/07/22	T. Moyron	0.10	79.00	B230	Analyze email from T. Ramm re DB.
07/07/22	T. Moyron	0.20	158.00	B230	Analyze emails from R. Block, B. Oppenheimer re DACAs.
07/07/22	T. Moyron	0.20	158.00	B230	Correspond with B. Nolan re GSEs (.1); analyze C. O'Leary related email (.1).
07/07/22	T. Moyron	0.50	395.00	B230	Zoom meeting with DIP Lender, Greenberg, and FTI re pipeline and sale process.
07/07/22	T. Moyron	0.50	395.00	B230	Zoom meeting with Company, FTI and Dentons re DIP Lender De-Brief and questions.
07/07/22	T. Moyron	0.30	237.00	B230	Call with W. Nolan and T. Meerovich regarding sale process, TCB, and others.

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07/07/22	C. Montgomery	3.80	4,598.00	B230	Communications with C. O'Leary regarding Angel Oak trade issues (.1); participate in zoom call with Freddie Mac Counsel including O. Alaniz, T. Moyron, C. O'Leary (.4); communications with T. Moyron regarding Freddie and Fannie but back requests (.4); communications with T. Moyron re sale process (.1); participate in TCB call with K. Ziman (.5); participate in loan sale planning call Dentons only T. Moyron, E.L. Smith, C. O'Leary (.5); communications with L. Macksoud re ordinary course question (.1); phone call with L. Macksoud re same (.3); communications with T. Ramm and T. Moyron regarding GSE cash window and GNMA trading (.1); communications with T. Moyron and T. Meerovich regarding ordinary course (.1); review originators proposals (.1); review communications from Fannie Mae senior counsel (.1); phone call with E.L. Smith re Fannie Mae pool fees (.1); zoom call TCB counsel K. Ziman, T. Moyron, T. Meerovich and others re closeout sale (.4); zoom call Customers and Flagstar regarding securities sales including J. Feldsher and T. Kelly (.5).
07/07/22	E. Smith	1.10	1,127.50	B230	Attended review of loan sale alternatives with FTI, T. Meerovitch, PIMCO and PIMCO's counsel, N. Peterman, and Dentons, T. Myron.

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07/08/22	C. Montgomery	2.70	3,267.00	B230	Communications with T. Moyron re GNHMA pool sales (.1); communications with C. O'Leary regarding GNMA pools (.1); communications with C. O'Leary and T. Ramm regarding Angel Oak trades and repurchase obligations (.1); communications with T. Moyron, T. Ramm, K. Ziman and others regarding trade consents for GNMA (.2); zoom call with TCB business and lawyers including K. Ziman, M. Simm, T. Moyron, T. Meerovich, B. Nolan, regarding TCB windup (.8); Dentons FTI call regarding consent to TCB (.2); draft consent note to K. Ziman and discuss same with L. Smith (.2) ; draft Notice to DIP Lender re consent to collateral sale for TCB (.4); communications with T. Moyron regarding Customers Bank collateral dispute (.2); review Customers JSCA and communications with E. L. Smith and C. O'Leary regarding Flagstar limitations (.4).
07/08/22	T. Moyron	1.00	790.00	B230	Conference call with Board, Company, FTI, and Dentons re status update, GSEs, warehouse lenders, and other matters.
07/08/22	T. Moyron	1.20	948.00	B230	Correspond with FTI, T. Ramm, et al re trades and communications to warehouse lenders (.6); analyze related excel sheets (.2); correspond with warehouse lenders re same (.4).
07/08/22	T. Moyron	0.70	553.00	B230	Zoom meeting with GNMA, Company, FTI and Dentons re questions and responses (.5); follow up emails with counsel (.2).
07/08/22	T. Moyron	0.40	316.00	B230	Analyze emails from T. Ramm et al. re Freddie Mac Servicing Portfolio and responses to questions.
07/08/22	T. Moyron	0.60	474.00	B230	Meeting with Freddie and counsel, FTI and Dentons re status, requests, and other questions.
07/08/22	T. Moyron	1.00	790.00	B230	Participate in zoom meeting with Bravo, FTI, Company and Dentons re status, GSEs, sales and other updates.

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07/08/22	T. Moyron	0.50	395.00	B230	Meeting with counsel for Flagstar, FTI, et. al, regarding liquidation of collateral and related matters.
07/08/22	S. Schrag	1.20	780.00	B230	Review correspondence from T. Moyron regarding milestones in DIP (.1); confer with T. Moyron and S. Maizel regarding the same (.2); conduct research related to milestones (.3); review and analyze DIP Term sheet regarding milestones (.2); confer with Dentons team regarding upcoming milestones (.3); confer with A. Helman regarding the same (.1).
07/08/22	C. O'Leary	3.30	2,805.00	B230	Plan/prepare for/conduct telephone conference with GNMA and exchange correspondence re: the same (1.2); Exchange correspondence re: financing facility inquiries and servicing portfolios (0.5); office conference with L. Smith re: GNMA MBS sale (0.8); exchange correspondence with Freddie Mac and Planet Home re: servicing portfolios (0.8).
07/08/22	C. O'Leary	2.50	2,125.00	B230	Plan/prepare for/conduct telephone conference with TCB, Paul Wells and FTI re: liquidation offers (0.9); Plan.prepare for/conduct telephone conference with Freddie MAC and counsel re: portfolios and exchange correspondence re: the same (0.7); Plan/prepare for/ conduct telephone conference with Angel Oak's counsel re: prior trades and exchange correspondence re: the same (0.9).
07/08/22	C. O'Leary	1.30	1,105.00	B230	Plan/prepare for conduct telephone conference with Flagstar's counsel re facility status (0.9); review/analyze TCB's notice of liquidation and exchange correspondence re: the same (0.4).
07/10/22	C. O'Leary	0.40	340.00	B230	Exchange correspondence re: financing facilities and GSE relationships.
07/11/22	S. Schrag	1.00	650.00	B230	Meeting with T. Moyron and L. Smith regarding pending matters, including mechanics DIP repayment, pipeline, and other related matters.
07/11/22	S. Schrag	0.10	65.00	B230	Call with S. Maizel and T. Moyron regarding status of DIP Lender.

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07/11/22	S. Schrag	0.30	195.00	B230	Confer with T. Moyron regarding recent developments with DIP Lender.
07/11/22	C. Montgomery	3.50	4,235.00	B230	Communications with T. Moyron and C. O'Leary regarding custodial transfers and servicing transfers (.2); review Barclays Marks for KCC loans (.3); communications with E.L. Smith and T. Meerovich regarding DIP Cash Flow Lender takeout by Barclays (.1); communications with T. Sullivan regarding TCB loan file collection (.1); communications with T. Ramm, T. Meerovich, C. O'Leary and T. Moyron regarding TCB pooled securities (.3); zoom call T. Moyron, C. O'Leary, E.L. Smith regarding unwind of TCB MRA loan sales as part of securities pools (.5); communications regarding JVB collateral breakdown and review JVB Documentation (1.0); communications regarding Planet Home servicing with C. O'Leary (.1); communications with J. Feldsher and T. Moyron regarding GNMA pool summary (.2); zoom call T. Ramm and A. Samples with E.L. Smith regarding loan pool sales (.6); communications with T. Ramm regarding DB cash pool account (.1).
07/11/22	T. Moyron	0.40	316.00	B230	Conference call with T. Ramm regarding request from TCB, Customers, and Flagstar.
07/11/22	E. Smith	0.70	717.50	B230	Attended call with cash flow DIP lender and counsel, FTI, T. Meerovitch, FGMC, A. Samples, and Dentons, T. Moyron, to discuss funding of pipeline of rate locked Unfunded loans.
07/11/22	T. Moyron	2.30	1,817.00	B230	Analyze numerous emails from L. Smith, C. O'Leary re TCB claims and issues raised (.7); Analyze correspondence from K. Biron re process re Flagstar, TCB, and Customers (.1); correspond with FGMC, L. Harrison, et al., re same and analyze related matters and documents (1.5).
07/11/22	T. Moyron	0.50	395.00	B230	Phone calls C. Montgomery re case updates and pending issues.

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07/11/22	T. Moyron	1.90	1,501.00	B230	Correspond with C. Montgomery and C. O'Leary regarding custodial transfers and servicing transfers (.2); analyze communications with L. Smith and T. Meerovich regarding DIP Cash Flow Lender takeout by Barclays (.1); communications with T. Ramm, T. Meerovich, C. O'Leary regarding TCB pooled securities (.3); zoom call C. Montgomery, C. O'Leary, L. Smith regarding unwind of TCB MRA loan sales (.5); analyze correspondence regarding JVB collateral breakdown and review documentation and related issues (.6); communications with J. Feldsher and C. Montgomery regarding GNMA pool summary (.2).
07/11/22	C. O'Leary	2.00	1,700.00	B230	Plan/prepare for/ conduct office conference with T. Moyron and C. Montgomery re: TCB collateral and direction and exchange correspondence re: the same (1.2); exchange correspondence re: JVB portfolio and liquidation notice (0.8).
07/11/22	C. O'Leary	1.70	1,445.00	B230	Review/analyze correspondence from Customers bank re: collateral release and exchange correspondence re: the same (0.8); review/analyze JSACA and exchange correspondence re: pooling and settlement mechanics (0.9).
07/11/22	T. Moyron	0.80	632.00	B230	Analyze T. Meerovich, et al., emails and attachment re refinance proceeds estimate (.2); and correspond with L. Smith, et al., regarding same (.6).
07/11/22	T. Moyron	0.40	316.00	B230	Analyze email from T. Ramm, et al., re loan populations.
07/11/22	T. Moyron	0.10	79.00	B230	Prepare email to J. Krasne, et al., re pipeline.
07/11/22	T. Moyron	0.50	395.00	B230	Analyze GSE requests and outstanding items (.4); prepare email to A. Samples, et al., re same (.1).
07/11/22	T. Moyron	0.20	158.00	B230	Analyze emails from M. Schawarmann re Funding Request.

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07/12/22	C. O'Leary	1.10	935.00	B230	Review/analyze correspondence re: pre-petition financing facilities and exchange correspondence re: the same.
07/12/22	C. O'Leary	2.80	2,380.00	B230	Plan/prepare for/conduct Telephone Conference T. Moyron and FTI re: open items and pre-petition financing facilities.
07/12/22	C. O'Leary	0.60	510.00	B230	Plan/prepare for/conduct telephone conference TCB, Flagstar, customers and counsel re: asset sales and securitizations and exchange correspondence re: the same.
07/12/22	C. O'Leary	0.60	510.00	B230	Exchange correspondence re: Agency MBS and procedures related thereto.
07/12/22	C. O'Leary	0.80	680.00	B230	Review/analyze account segregation notices to Rushmore and FGMC and exchange correspondence re: the same.

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07/12/22	C. Montgomery	5.60	6,776.00	B230	Communications from C. O'Leary and T. Ramm regarding JVB (.1); communications from T Moyron and C. O'Leary re lender unwind process proposal (.2); zoom call L Harrison and T. Moyron regarding lender unwind proposal (.6); upload GSE agreements and review same (.3); MS Teams call with warehouse lenders and counsel including K. Ziman, J. Feldsher, T. Ramm, T. Moyron regarding GNMA securities disposition, other GSE securitizations and whole loan sales (.6); phone call T. Moyron and E. L Smith regarding Flagstar loan sale proceeds (.1); communications and Zoom call with L. Harrison re same (1.2); communications with T. Moyron re same (.1); communications with J. Murphy regarding same (.4); phone with L. Harrison re same (.1); communications with E.L. Smith and K. Ziman regarding GSE pool summary of TCB purchased loans (.2); communications with T. Moyron regarding DIP purchase of whole loan sales (.2); review Customers demand to Rushmore (.1); communications A Helman and C. O'Leary regarding TCB set off against Fannie deposit (.6); review T. Ramm information on TCB pooled securities and aggregate loans (.8).
07/12/22	D. Cook	0.70	434.00	B230	Zoom conference with Dentons and warehouse lenders regarding securities.
07/12/22	T. Moyron	0.10	79.00	B230	Analyze email from P. Partee re timing re pipeline.
07/12/22	T. Moyron	0.20	158.00	B230	Analyze issues related to TCB set off rights re account.
07/12/22	T. Moyron	0.60	474.00	B230	Conference call with S. Maizel re pending matters including labor, plan, and pipeline.
07/12/22	T. Moyron	0.60	474.00	B230	Analyze T. Ramm, et al., emails related to mortgage pools and related issues.
07/12/22	T. Moyron	1.70	1,343.00	B230	Analyze issues related to warehouse lenders and review analysis related to AR JSACA and related matters.

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07/12/22	T. Moyron	0.60	474.00	B230	Meeting with L. Harrison and C. Montgomery regarding lender unwind proposal.
07/12/22	T. Moyron	0.70	553.00	B230	MS Teams call with warehouse lenders and counsel including K. Ziman, J. Feldsher, T. Ramm, et al., regarding GNMA securities disposition, other GSE securitizations and whole loan sales (.6); phone call with C. Montgomery and E.L. Smith regarding Flagstar loan sale proceeds (.1).
07/12/22	T. Moyron	0.20	158.00	B230	Analyze S. Lindbloom, et al., emails regarding TCB requests and related questions.
07/12/22	T. Moyron	0.20	158.00	B230	Analyze T. Ramm, et al., emails regarding GSE and GNMA detail on TCB's warehouse lines.
07/12/22	T. Moyron	0.30	237.00	B230	Analyze Flagstar collateral matters.
07/12/22	T. Moyron	0.20	158.00	B230	Analyze C. O'Leary, et al., correspondence regarding JVB and SACA.
07/12/22	T. Moyron	0.20	158.00	B230	Analyze N. Sombuntham, et al., emails re documents and timing re refinancing of the PIMCO-funded prepetition loans with the Barclays facility.
07/12/22	T. Moyron	0.30	237.00	B230	Analyze email from T. Ramm, K. Tom, et al., regarding trade, process, permission and other issues.
07/12/22	T. Moyron	0.30	237.00	B230	Analyze email from C. O'Leary, et al., re MBS Fee deposit to TCB .
07/12/22	T. Moyron	0.30	237.00	B230	Analyze N. Peterman emails and counsel for warehouse lender's follow-up emails re DIP lenders interest in potential purchase of loans.
07/13/22	C. O'Leary	1.40	1,190.00	B230	Review/analyze Rushmore notices of default and exchange correspondence re: the same.
07/13/22	C. O'Leary	0.70	595.00	B230	Plan/prepare for/ conduct telephone conference Dorsey (Customers' counsel) re; Rushmore notices and segregation requests.
07/13/22	C. O'Leary	0.60	510.00	B230	Attend telephone conference with FTI re: pipeline and asset sales.

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07/13/22	C. O'Leary	0.40	340.00	B230	Telephone Conference John Rosenthal (Morgan Lewis) re: JVB cash mechanics.
07/13/22	C. O'Leary	1.60	1,360.00	B230	Review/analyze TCB's notice of default (0.6); exchange correspondence re: GNMA MBS and sale mechanics (1.0).
07/13/22	C. O'Leary	0.70	595.00	B230	Plan/prepare for/ conduct TC Morgan Lewis re: Servicer segregation requests and exchange correspondence re: the same.
07/13/22	E. Smith	5.70	5,842.50	B230	Prepared drafts of subservicer directions and confirmations, and confirmations to warehouse providers, regarding segregation of cash collateral, and conferred with T. Moyron, C. Montgomery, L. Macksoud and C. O'Leary regarding revisions to direction notices and confirmations formations (4.2); distributed directions and confirmations to subservicer and confirmations of direction notices to subservicer to counsel for warehouse provider (0.80); reviewed subservicing questions from counsel for warehouse provider, reviewed client responses to such questions and prepared responses to such questions (0.7).
07/13/22	E. Smith	1.10	1,127.50	B230	Review and prepare correspondence with subservicer regarding servicer segregation and transfer of loan level information and loan sale proceeds (0.6); confer with Dentons colleagues including T. Moyron, C. Montgomery and C. O'Leary regarding set off questions and segregation of warehouse provider loans and loan sale proceeds (0.5).
07/13/22	D. Cook	0.70	434.00	B230	Discuss DIP and potential objections with L Macksoud (.1); analysis as to pending UCC appointment in connection with same (.2); analysis as to DIP milestones (.2); telephone conference with L Smith regarding warehouse lender distribution lists (.1); email communication with M Feingold regarding same (.1);.

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07/13/22	E. Smith	0.40	410.00	B230	Confer with counsel for Barclays, P. Partee and S. Daily, regarding arrangement of DIP credit facility advances for transfer of mortgage loans originated immediately prior to the petition date to the Barclays warehouse line.
07/13/22	S. Schrag	0.50	325.00	B230	Review correspondence regarding demand for accounting of cash collateral (.2); attend conference call with Customers counsel and Dentons team, including T. Moyron, C. O'Leary, as well as L. Davis Jones to discuss demand and potential resolution (.3).
07/13/22	C. Montgomery	5.90	7,139.00	B230	Communications with T. Moyron and E. L. Smith regarding Customers Bank demand for cash segregation and review of cash management order (.5); communications with L Harrison regarding Customers (.3); zoom call with Customers Bank regarding Rushmore and segregation demand (.3); communications with L. Jones and B. Nolan regarding perfection issue for Customers (.2); pre-call with C. O'Leary, J. Murphy re Rushmore (.3); zoom call with J. Grebinar and C. O'Leary, E.L. Smith (.5); file note and Communications with L. Smith And T. Moyron re same (.3); review Customers MRA re servicer rights and communications with E.L. Smith and C. O'Leary re same (1.1); communications with T. Moyron re Customers Bank stipulation (.1); phone call with E.L. Smith regarding Customers and Rushmore (.3); draft note to Customers counsel (.5); review Customers motion and communications with T. Moyron re same (.4); communications with G. Miller regarding Rushmore servicing rights to setoff rights (.3); phone call with A. Helman regarding cash management issues (.9); communications with L. Lerman regarding converted word version of DIP Repo order (.4).
07/13/22	T. Moyron	0.20	158.00	B230	Correspond with S. Warren re Customers motion and stipulation.

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07/13/22	T. Moyron	1.40	1,106.00	B230	Analyze matters with Subservicer regarding segregation and transfer of loan level information and loan sale proceeds (.9); confer with L. Smith, C. Montgomery and C. O'Leary regarding set off questions and segregation of warehouse provider loans and loan sale proceeds (.5).
07/13/22	T. Moyron	0.30	237.00	B230	Confer with S. Schrag and L. Smith regarding loans and off take process.
07/13/22	T. Moyron	0.30	237.00	B230	Conference call with counsel for Customers, L. Jones, C. Montgomery, et al., re segregation of funds.
07/13/22	T. Moyron	0.50	395.00	B230	Correspond with E. Schnabel re stipulated order (.1); analyze stipulated order (.2); correspond with C. Montgomery, et al. re same (.2).
07/13/22	T. Moyron	1.70	1,343.00	B230	Analyze further issues related to warehouse lenders, including steps regarding direction notices and confirmations, and related inquiries and issues related to Rushmore.
07/13/22	T. Moyron	0.20	158.00	B230	Analyze open issues related to cash management order.
07/13/22	T. Moyron	0.30	237.00	B230	Analyze correspondence from B. Oppeheimer re Note for 7/13 funding (.1); correspond with T. Meerovich, et al. re same (.2).
07/13/22	T. Moyron	0.60	474.00	B230	Analyze Customers' motion to segregate and related papers (.4); correspond with M. Caloway, et al., re same (.2).
07/13/22	T. Moyron	0.90	711.00	B230	Forward demand to segregate to L. Jones (.1); review research related to safe harbor protections and waiver, matters related liquidation of collateral and pursuit of remedies and analyze related issues (.8).
07/13/22	T. Moyron	0.40	316.00	B230	Analyze further issues related to Rushmore and Flagstar re resolutions and potential stipulation.
07/13/22	T. Moyron	0.50	395.00	B230	Analyze Customers motion (.3) and communications with C. Montgomery re same (.2) .

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07/13/22	T. Moyron	0.50	395.00	B230	Pipeline sale discussion with T. Meerovich, T. Moyron and others.
07/13/22	T. Moyron	0.40	316.00	B230	Analyze DIP milestones and matters related thereto.
07/13/22	T. Moyron	0.60	474.00	B230	Analyze email from D. Oien (.2) and analyze various GNMA issues raised and correspondence (.4).
07/13/22	T. Moyron	0.20	158.00	B230	Correspond with T. Meerovich, et al. re FNMA.
07/14/22	T. Moyron	2.50	1,975.00	B230	Analyze further issues regarding cash collateral motion, cash management, and related orders (1.2); analyze further issues related to warehouse providers and Rushmore (.7); analyze issues related to bid summaries to be distributed warehouse lenders (.6).
07/14/22	C. Montgomery	4.90	5,929.00	B230	Communications with A. Helman re JSACA as control accounts (.2); phone call with A. Helman regarding Cash Management issues (.7); communication with L Smith regarding Customers Bank control accounts (.2); communications with T. Moyron regarding warehouse lender communications (.1) : communications with M. Hyland and T. Meerovich regarding PIMCo form of note (.2) ; communications with L. Lerman regarding Cash Flow DIP Order (.1) ; review Rushmore related documents (.4); status call Dentons and FTI including T. Meerovich and T. Moyron (2.1); communications with C. OLeary and T. Moyron regard support asks of PIMCo (.2); and draft support request note (.7).
07/14/22	S. Schrag	0.80	520.00	B230	Call with L. Macksoud, C. Montgomery, and T. Moyron regarding Customers Bank motion to compel (.6); confer with L. Macksoud regarding stipulation (.1); review correspondence from FreddieMac counsel regarding the same (.1).
07/14/22	E. Smith	0.30	307.50	B230	Confer with counsel, T. Moyron and N. Peterman, regarding funds flows through servicer and custodian.

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Date	Timekeeper	Hours	Amount	Task	Narrative
07/14/22	L. Macksoud	7.00	5,390.00	B230	Review order entered by court relating to Customer's Bank motion (.2), draft and revise stipulation with counsel to Customer's Bank (1.5), emails and phone call with working group, and counsel to Customers and Freddie Mac re same (2.1), review accounts affected by same and confer with company re same (.8), confer with L. Smith re Flagstar confirmation language and draft and revise same (.7), confer with C. Doherty re KEIP (.4) and review existing budget and updated budget re same (.3), call with S. Schrag, C. Montgomery and T. Moyron re potential written response to Customer's motion and potential hearing on same set for 7/15 (.5), call with counsel to Freddie Mac re open issues (.3), follow up call with T. Moyron re same (.2).
07/14/22	T. Moyron	0.20	158.00	B230	Analyze additional emails from J. Grebinar, et al. re TCB.
07/14/22	T. Moyron	0.40	316.00	B230	Correspond with FTI re budget (.2); analyze updated budget (.2).
07/14/22	T. Moyron	1.20	948.00	B230	Analyze matters related TCB, Flagstar and Rushmore, including requests from each related to segregation of cash and other matters (.7); analyze emails from J. Grebinar and counsel for Flagstar and TCB (.4); analyze emails from T. Ramm, et al. re eResi/Angel Oak (.4).
07/14/22	T. Moyron	2.70	2,133.00	B230	Analyze stipulation from Customers Bank (.2); correspond with Dentons re same (.4); correspond with Dorsey re stipulation (.2); conference call with C. Montgomery, et al., regarding Customer Bank motion (.5); analyze changes to Customers stipulation from multiple parties, including Greenberg (.6); correspond with L. Jones, et al., re same (.3); conference call with Freddie and lawyers for Freddie re Customers motion and stipulation and correspond regarding same thereafter (.5).
07/14/22	T. Moyron	0.30	237.00	B230	Analyze additional comments from Dorsey on cash collateral stipulation and emails from E. Schnabel.

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07/14/22	C. O'Leary	1.40	1,190.00	B230	Review/analyze Customer's proposed cash segregation stipulation and preparation of comments to the same; exchange correspondence re: the same.
07/14/22	C. O'Leary	1.20	1,020.00	B230	Exchange correspondence re: originator proposal and liquidation matters.
07/14/22	C. O'Leary	2.40	2,040.00	B230	Office Conference John Rosenthal re: SACA accounts and remittance mechanics and exchange correspondence re: the same.
07/14/22	C. O'Leary	1.30	1,105.00	B230	Exchange correspondence re: Angel Oak trades and repurchase obligations.
07/14/22	C. O'Leary	2.20	1,870.00	B230	Plan/prepare for/conduct Telephone Conference FTI re: open items and financing facilities.
07/15/22	C. O'Leary	0.60	510.00	B230	Plan/prepare for/conduct Telephone Conference counsel for Customers and Freddie re: segregated cash stipulation and exchange correspondence re: the same.
07/15/22	C. O'Leary	1.70	1,445.00	B230	Plan/prepare for/conduct Telephone Conference Angel Oak counsel and FGMC re: bailee letter and collateral recall at USB and exchange correspondence re: the same.
07/15/22	C. O'Leary	0.50	425.00	B230	Telephone Conference FGMC treasury re: GNMA trades and disbursement of trade proceeds.
07/15/22	C. O'Leary	0.80	680.00	B230	Exchange correspondence re: financing facilities, liquidation proceeds and servicing requests.
07/15/22	C. O'Leary	0.60	510.00	B230	Review Agency proposals and exchange correspondence re: the same.
07/15/22	C. O'Leary	0.30	255.00	B230	Exchange correspondence re: DBNTC transfer procedures.
07/15/22	E. Smith	1.20	1,230.00	B230	Meeting with T. Moyron regarding Angel Oak loan trade questions, warehouse provider demands for additional subservicer directions, loan pipeline funding and related matters.

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07/15/22	T. Moyron	2.80	2,212.00	B230	Analyze open issues related stipulation and Customers motion in connection with upcoming hearing and negotiations (.9); numerous conference calls with O. Alaniz, E. Schnabel, E. Howell, re language in stipulation and resolution of Customers Motion (.6); correspond with E. Schnabel, et al., re same (.4); conference call with Freddie, Customers, FGMG, et al. re stipulation and resolution of Customers motion (.2); prepare revised sentence for stipulation (.1); prepare email to E. Schnabel, et al., regarding revision to stipulation (.1) and further correspondence regarding same and resolution (.3); correspond with PSZJ re Dorsey communications with Chambers (.2).
07/15/22	T. Moyron	1.00	790.00	B230	Call with DIP lender, N. Peterman, B. Nolan, S. Alberts, et al. re KERP/KEIP.
07/15/22	T. Moyron	0.50	395.00	B230	Analyze email from N. Sombuntham re agency proposals (.1); analyze Agency proposals (.3); correspond with L. Smith re same (.1).
07/15/22	T. Moyron	1.20	948.00	B230	Meeting with L. Smith regarding Angel Oak, warehouse lenders, pipeline, and other matters.
07/15/22	T. Moyron	0.30	237.00	B230	Correspond and calls with L. Smith re Customer Bank stipulation and resolution of motion.
07/15/22	T. Moyron	0.10	79.00	B230	Analyzed entered order and stipulation re Customers Bank.
07/15/22	T. Moyron	0.30	237.00	B230	Analyze L. Smith correspondence to Rushmore instructing to follow TCB directions (.1); analyze emails from M. Turkel, counsel for TCB, J. Grebinar from Roosevelt Management, et al. (.2).
07/15/22	C. Montgomery	1.50	1,815.00	B230	Phone conference with T. Moyron, T. Meerovich, T. Ramm regarding Customers Bank and Freddie Mac (.3); communications with L. Harrison regarding Freddie Mac Stipulation (.3); zoom call regarding MSR servicing sale with T. Meerovich, T. Moyron and others (.9).

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07/15/22	T. Moyron	2.40	1,896.00	B230	Further analysis of issues related to Freddie Mac position and stipulation and resolution thereof (.8); prepare email to N. Peterman (.1); further correspondence with E. Schnabel, L. Macksoud, et al., re same (.4); further correspondence and analysis regarding warehouse lenders and servicing rights disposition options (1.1).
07/16/22	C. O'Leary	0.60	510.00	B230	Exchange correspondence re: notices to subservicers (0.3); preparation of summary re: MSR facilities and sales motions and exchange correspondence re: the same (0.3).
07/17/22	T. Moyron	0.50	395.00	B230	Attention to status of final REPO order (.3); correspond with C. Montgomery re same (.2).
07/17/22	T. Moyron	1.00	790.00	B230	Correspond with M. Caloway, et al., regarding request from Fannie (.2); analyze COC and proposed order (.3); further correspondence with M. Caloway re same (.3); prepare email to S. Warren attaching COC and proposed order (.1); prepare email to counsel for Customers Bank re same (.1).
07/17/22	T. Moyron	0.30	237.00	B230	Correspond with A. Helman regarding cash management order.
07/17/22	C. Montgomery	1.10	1,331.00	B230	Communications with T. Moyron regarding Final DIP repo order (.7); communications with L Jones, T. Moyron and S. Warren regarding Freddie Mac response to Customers stipulation and need for an additional stipulation (2); communications with E.L. Smith regarding Rushmore, SLS and BSI as subservicers on certain TCB and Flagstar Loans (.2).
07/17/22	C. O'Leary	2.20	1,870.00	B230	Preparation of MSR Sale motion and exchange correspondence re: the same.
07/17/22	S. Schrag	0.20	130.00	B230	Confer with A. Helman regarding potential research issues related to prepetition collateral and proceeds.
07/18/22	S. Schrag	0.50	325.00	B230	Call with T. Moyron, S. Maizel, C. Montgomery, L. Macksoud, and A. Helman regarding final cash management order.

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07/18/22	C. O'Leary	2.90	2,465.00	B230	Exchange correspondence re: GNMA trades and disbursement of funds (0.5); exchange correspondence re: financing facilities and sale motions (0.7); plan/prepare for/conduct telephone conference with FTI re: MSR sale motion (0.7); telephone conference with DBNTC re: JSACA procedures and disbursement of funds and exchange correspondence re: the same (0.4); exchange correspondence re: notices to servicers and remittance procedures (0.6).
07/18/22	C. Montgomery	4.30	5,203.00	B230	Zoom call with A. Helman, T. Moyron, L. Macksoud re cash management and Freddie Mac (.5); communications with O. Alaniz, E.L. Smith and T. Moyron regarding servicing stipulation with Freddie Mac (.4); communications with T. Moyron, T. Meerovich regarding Flagstar proceeds segregation (.2); communications with N. Sombuntham, EL Smith, C. O'Leary and T. Moyron regarding Barclays funding issues for Pimco prepetition loans (.2); communications and talks with C. Qian, T. Ramm and E.L. Smith regarding GNMA Flagstar securities settlement proceeds (.7); communications with J. Grebinar, E.L. Smith, T. Moyron and T. Kelly regarding Rushmore P&I collections (1.1); communications with E.L. Smith regarding ACH prefunding (.2); zoom call with Flagstar counsel re Signature bank accounts for Segregation of collateral proceeds (.5); zoom call with L. Harrison, L. Smith, T. Moyron and S. Maizel regarding MSR sales process (.5).
07/18/22	E. Smith	0.30	307.50	B230	Reviewed draft of Freddie Mac servicing assurances stipulation (0.30).
07/18/22	E. Smith	2.40	2,460.00	B230	Meetings with Customers, TCB, FGMC, FTI, et al., re failed trades and process for trade approvals moving forward (1.6), analyze related emails from T. Ramm, et al. (.3), follow up call with T. Moyron re same and related matters (.3); follow up call with M. Turkel, counsel for TCB, regarding TCB loan recall question (.2).

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07/18/22	E. Smith	0.40	410.00	B230	Assisted C. Montgomery with response to MBS payment remittance question.
07/18/22	E. Smith	0.70	717.50	B230	Attended update meeting with cash flow DIP lender.
07/18/22	E. Smith	0.50	512.50	B230	Reviewed and prepared correspondence (among J. Grebinar, counsel for subservicer, T. Kelly and K. Ziman, counsel for warehouse providers, and Dentons team, T.Moyron, related to reconciliation, segregation and transfer of scheduled loan payments remitted to FGMC by subservicers.
07/18/22	E. Smith	0.70	717.50	B230	Call with Flagstar counsel, K. Biron, and Dentons team, T. Moyron, C. Montgomery, S. Maizel regarding subservicer remittance segregation (0.4); confer with C. Montgomery regarding funds segregation issues (0.3).
07/18/22	S. Maizel	0.50	485.00	B230	Zoom call with DIP operations lender, N. Peterman, FTI, etc. re pending financing issues.
07/18/22	T. Moyron	0.30	237.00	B230	Analyze email from J. Grebinar regarding confirmation for Rushmore and related emails.
07/18/22	T. Moyron	0.20	158.00	B230	Correspond with counsel for Freddie regarding meeting with FGMC and its advisors and Freddie.
07/18/22	D. Cook	3.30	2,046.00	B230	Analyze subservicer communications in order to assemble records of segregation notices (2.4); begin draft of same (.4); analyze warehouse lender distribution list forwarded by M Feingold for inclusion of all necessary parties (.5).
07/18/22	T. Moyron	0.50	395.00	B230	Zoom meeting with A. Helman, et al., re cash management order.
07/18/22	T. Moyron	1.50	1,185.00	B230	Meeting with Customers, TCB, FGMC, FTI, et al., re failed trades and process moving forward (.9), analyze related emails from T. Ramm, et al. (.3), and follow up call with L. Smith re same and related matters (.3).

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07/18/22	T. Moyron	1.10	869.00	B230	Meeting with Committee counsel, L. Jones, and Dentons re pending matters and questions related to cash flow DIP, Barclays facility, KERP/KEIP, and other matters.
07/18/22	T. Moyron	0.50	395.00	B230	Call with DIP cash flow lender, FTI, FGMC, S. Maizel et al. re pending issues.
07/19/22	T. Moyron	0.40	316.00	B230	Zoom meeting regarding Today's Trade with Customers, DB, FGBC, et al. (.2) and call with T. Ramm thereafter (.2).
07/19/22	T. Moyron	0.50	395.00	B230	Conference call with Freddie Mac and counsel for Freddie Mac; FGMC; T. Meerovich, S. Maizel et al. re proposal, term sheet, and assurances.
07/19/22	T. Moyron	0.30	237.00	B230	Teams Meeting with Customers, S. De Castro, L. Smith, et al. re payments and segregation.
07/19/22	T. Moyron	0.50	395.00	B230	Conference call with N. Peterman, L. Macksoud, et al., re Final Cash Flow DIP Order.
07/19/22	T. Moyron	0.70	553.00	B230	Analyze Final Cash Flow DIP Order and redlines from Dentons and GT.
07/19/22	T. Moyron	0.70	553.00	B230	Analyze Freddie Mac Stipulation and Schedule and proposed redline (.6); prepare emails to FGMC and FTI re same (.1).
07/19/22	T. Moyron	0.50	395.00	B230	Analyze emails from N. Sombuntham, T. Ramm, et al., regarding FNMA proposal deck and prepare email re same (.3); analyze FNMA proposal deck (.2).
07/19/22	E. Smith	0.80	820.00	B230	Confer with T. Meerovitch, FTI, and T. Moyron regarding subservicer remittance reconciliation (0.3); prepared correspondence with subservicer regarding need for monthly remittance re-calculation (0.3).
07/19/22	E. Smith	0.70	717.50	B230	Confer with general counsel of owner of subservicer, M. Duquesnay, regarding FGMC direction to segregate and turn over proceeds of any loans controlled by warehouse liquidity providers.

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07/19/22	E. Smith	0.60	615.00	B230	Attend all hands call with FGMC (A. Samples), FTI (T. Meerovitch), Freddie Mac team and Dentons team, T. Moyron, to discuss business relationships.
07/19/22	E. Smith	0.50	512.50	B230	Confer with representatives of Customers Bank, C. MacElree, and counsel, T. Kelly, and FGMC, S. De Castro, regarding subservicer remittance reconciliation process and delivery of payments to Customers.
07/19/22	E. Smith	2.30	2,357.50	B230	Calls with FGMC, S. De Castro, regarding reconciliation of loan payment remittance from subservicer across loans on warehouse lines with Customers, Texas Capital, JVB and Flagstar (1.7); reviewed and prepared correspondence with representatives of Customers Bank, E. Schnabel, T. Kelly and C. MacElree regarding calculation of remittance amounts and confirmation of segregation of share of remittance amount for Customers; (0.6).
07/19/22	E. Smith	0.60	615.00	B230	Reviewed draft adequate assurance stipulation proposed by representatives of Freddie Mac (0.3); confer with T. Moyron and C. Montgomery regarding revisions to stipulation draft (0.3).
07/19/22	E. Smith	0.30	307.50	B230	Reviewed and prepared subservicer remittance correspondence with subservicer and representatives of warehouse providers - Customers Bank, E. Schnabel, and TCB, K.Ziman.
07/19/22	E. Smith	0.40	410.00	B230	Attended all hands update call with representatives of warehouse providers (Customers, TCB and Flagstar), FGMC, T. Ramm, FTI, T. Meerovitz, and Dentons team, T. Moyron summarizing MBS trades struck this morning, and next steps in trade settlement process.
07/19/22	E. Smith	1.10	1,127.50	B230	Attend call with subservicer and FGMC to reconcile P&I remittances to be made today by subservicer, with focus on remittances in favor of Customers Bank and Texas Capital Bank.

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07/19/22	E. Smith	0.80	820.00	B230	Attended call with L. Macksoud and counsel for TCB, K. Ziman and M. Turkel, to discuss questions regarding draft of final cash management order.
07/19/22	D. Cook	2.60	1,612.00	B230	Draft subservicer communications distribution list with respect to in order to assembling records of segregation notices.
07/19/22	C. O'Leary	1.60	1,360.00	B230	Review/analyze correspondence re: liquidation of securities and JSACA disbursements (0.8); exchange correspondence re: asset sales and financing facilities (0.8).
07/19/22	C. Montgomery	9.00	10,890.00	B230	Communications with T. Moyron regarding E. Schnabel request for Ordinary course repo order (.1); communications with L. Smith regarding Rushmore remittances (.1); review adequate protection draft and communications with EL Smith re same (.8); revise Final DIP Repo Order (3.1); review and comment upon financial regulators' information requests (.1); participate in zoom call regarding Customers and 506(c) issues with L. Macksoud, L. Harrison, S. Schrag (.5); zoom call with Freddie Mac re settlement (.6); zoom call with T. Moyron and N. Peterman (.5); zoom call with A. Samples, T. Meerovich, T. Ramm re LLPA obligations (.8.); review Fannie Mae Slide deck (.3); communications with B. Clarke and T. Moyron regarding Barclays Side Letter (.7); further revision to proposed final DIP Repo Order (1.1).
07/19/22	S. Schrag	0.60	390.00	B230	Confer with C. Montgomery, L. Macksoud, L. Harrison, and T. Moyron regarding Customers' request re fees (.3); call with warehouse lenders (T. Kelley) and Rusmore (S. de Castro) and Dentons (T. Moyron) regarding remittance of Rusmore(.3).
07/20/22	S. Schrag	0.30	195.00	B230	Review correspondence regarding TCB and funds (.2); review correspondence regarding Freddie Mac stipulation (.1).

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07/20/22	S. Schrag	0.40	260.00	B230	Review correspondence regarding Cash Flow DIP Order (.2); correspond with T. Moyron and L. Macksoud regarding the same (.2).
07/20/22	C. O'Leary	1.20	1,020.00	B230	Exchange correspondence re: Freddie Mac's information requests re: Customers motion to segregate (0.6); Exchange correspondence re: JVB securities settlements (0.6).
07/20/22	C. Montgomery	3.90	4,719.00	B230	Draft Debtors proposed revisions to Final DIP Repo Order and circulate same to FTI, N. Peterman, B. Clarke, M. Powers, E. Dorsey and others (1.0); review Barclays draft of DIP Repo order and communications with B. Clarke, T. Dorsey, N. Peterman re same (1.1); communications with L. Macksoud re Planet Home Mortgage request to modify Repo order (.1); zoom call with FTI team and T. Moyron regarding TCB segregation issues (.5); Zoom call with T. Moyron, L. Macksoud and S. Maizel re same (.5); communications with E.L. Smith and T. Moyron regarding ACH transfer fees (.2); review draft FNMA proposal deck and communications with A. Samples, N. Sombuntham re same (.5).
07/20/22	E. Smith	2.10	2,152.50	B230	Reviewed authority covering issue of post petition setoff to satisfy pre petition claim (0.9); confer with Dentons team, T. Moyron and S. Maizel, regarding response to setoff (0.9); revise draft setoff response to counsel for warehouse lender enforcing set off rights (0.3).
07/20/22	E. Smith	0.20	205.00	B230	Confer with L. Macksoud regarding comments received from parties in interest on terms of final financing and cash collateral orders.
07/20/22	S. Maizel	2.00	1,940.00	B230	Telephone conference with FTI re TCB issues (.3); zoom call with L. Harrison, etc. re same (1.0); review and respond to emails re same, including review of Swedebank opinion (.7).

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07/20/22	T. Moyron	0.70	553.00	B230	Analyze final repo order (.3); correspond with Hunton, et al., re same (.2) and analyze emails re same (.3).
07/20/22	T. Moyron	1.60	1,264.00	B230	Analyze issues related to updated Final DIP Repo Order and correspondence from C. Montgomery, et al. re same.
07/20/22	T. Moyron	0.10	79.00	B230	Analyze emails from S. Warren, et al. re extension of objection deadline.
07/20/22	T. Moyron	0.20	158.00	B230	Correspond with L. Lerman regarding various matters, including payments and DIP order language.
07/20/22	T. Moyron	0.60	474.00	B230	Prepare correspondence to N. Peterman, et al., re DIP orders, FNMA, etc.
07/20/22	T. Moyron	0.70	553.00	B230	Analyze Freddie Mac stipulation and adequate assurance issues and attached redline.
07/20/22	G. Medina	0.40	144.00	B230	Review at the request of L. Harrison The Ditech and ResCap cases in the Southern District New York and retrieve/send Orders granting adequate assurance entered in both cases.
07/21/22	T. Moyron	0.30	237.00	B230	Confer with L. Harrison regarding comments to latest draft of Freddie assurances stipulation and course of action regarding MSR motion.
07/21/22	T. Moyron	0.40	316.00	B230	Analyze correspondence with counsel for cash flow DIP lender, B. Oppenheimer, et al., re transfer of mortgage loans originated immediately prior to the petition date to Barclays DIP warehouse repo.
07/21/22	T. Moyron	0.20	158.00	B230	Prepare emails to L. Lehrman, et al, regarding call with GNMA and Debtors.
07/21/22	T. Moyron	0.20	158.00	B230	Correspond with O. Olaniz re Customers.
07/21/22	T. Moyron	0.90	711.00	B230	Confer with L. Smith and C. O'Leary regarding refinancing of loans funded prepetition with bridge loan proceeds.
07/21/22	T. Moyron	1.10	869.00	B230	Attended update call with FTI team, T. Meerovitch, C. Montgomery et al., re updates on financing work streams.

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07/21/22	T. Moyron	4.90	3,871.00	B230	Prepare emails to M. Power re DIP order (.1); analyze email from B. Oppenheimer regarding financing (.1) and further emails regarding same (.2); correspond with N. Peterman, et al., re Freddie stipulation (.3); prepare email to S. Daily re structure (.1) and prepare email to B. Oppenheimer re same (.1); Analyze Motion of Customers Bank for Entry of an Order Shortening Notice Periods with Respect to Customers Bank's Motion Seeking Confirmation of Applicability of 11 U.S.C. § 559 or, in the Alternative, Granting Relief from the Automatic Stay and Related Relief (.8), and correspond with N. Peterman, S. Warren, et al., re same (.7); analyze emails from O. Alaniz re Freddie stipulation and Customers (.2) and prepare emails to A. Samples, N. Peterman, et al., re same (.2); attention to potential arguments from Committee and other parties and preparation of responses thereto (.4); analyze emails from T. Ramm, C. O'Leary re JSACA (.3); analyze outstanding issues related to DIP, including Planet Home issue (.3); analyze issues related to FNMA wire and transfer of funds (.3); analyze C. MacElree, O. Alaniz, et al., emails re information to Freddie, including loan numbers, etc. (.4); analyze emails from T. Ramm, et al., re TCB (.2); analyze correspondence from L. Macksoud, et al., re DACAs (.2).
07/21/22	T. Moyron	0.40	316.00	B230	Communications with B. Clarke, C. Montgomery, et al. regarding GNMA language for Repo Order (.2); communications and phone call with C. Montgomery regarding Customers 559 motion (.2).
07/21/22	E. Smith	0.60	615.00	B230	Confer with T. Moyron regarding servicing rights sale and safe harbor comfort order motions (0.4); confer with C. Montgomery and correspond with FGMC internal counsel regarding warehouse repo line documentation (0.2).

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07/21/22	E. Smith	1.10	1,127.50	B230	Confer with T. Moyron and C. O'Leary regarding refinancing of loans funded pre-petition with bridge loan proceeds (0.90); review Barclays MRA loan transfer provisions (0.40); confer with counsel for Barclays, S. Daily, and C. O'Leary regarding loan transfers from bridge lender to Barclays warehouse line, and joint securities account control agreement (0.40); confer with counsel for bridge lender regarding loan transfer, bridge loan paydown and release of security interest in the loans to be transferred (0.20).
07/21/22	E. Smith	1.10	1,127.50	B230	Attended update call with FTI team, T. Meerovitch, and Dentons team, C. Montgomery and C. O'Leary, to provide updates on financing work streams.
07/21/22	C. O'Leary	3.30	2,805.00	B230	Plan/prepare for/conduct OC L. Macksoud and C. Montgomery re: Planet Home's comments to DIP Orders and exchange correspondence re: the same (0.8); preparation of MSR Sale Motion and exchange correspondence re: the same (0.9); Preparation of JSACA Amendment and exchange correspondence re: the same (1.6).
07/21/22	C. O'Leary	2.40	2,040.00	B230	Plan/prepare for/conduct TC FTI, L. Smith and C. Montgomery re: open financing facility issues (1.4); Plan/prepare for/conduct OC T. Moyron and L. Smith re: Barclays refinancing and JSACA issues (0.6); review/analyze comments to final DIP Repo Order and exchange correspondence re: the same (0.4).
07/21/22	C. O'Leary	2.60	2,210.00	B230	Plan/prepare for/conduct TC Hunton re: refinancing PIMCO loans and JSACA issues and exchange correspondence re: the same (0.6); exchange correspondence re: MSR private sale motion (0.8); review/analyze Customers 559 motion and Paul Weiss' comments to final DIP Repo Order (1.2).
07/21/22	D. Cook	6.50	4,030.00	B230	Research regarding reply ISO Cash Flow DIP Financing motion (3.9); begin draft of same (2.6).

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07/21/22	S. Maizel	0.30	291.00	B230	Telephone conference with Customers, FTI, etc. re loans.
07/21/22	C. Montgomery	2.20	2,662.00	B230	Communications with B. Kotliar regarding final DIP Repo Order (.1); communications with L. Lerner and T. Moyron regarding GNMA payments (.1); communications with N. Sombuntham and A. Samples regarding Fannie Mae proposal (.1); phone call C. O'Leary and L. Macksoud regarding Planet Home position on Cash Flow DIP order(.4); communications with B. Kotliar re same (.1); communications with L. Macksoud and T. Moyron regarding granted extensions (.2); communications with P. Moak re status of Final DIP Repo Order (.2); communications with L. Macksoud and E. Howe regarding Cash Flow DIP Order and Planet Home comments (.1); review Customers Bank motion to declare section 559 applicable to MRA (.5); communications with B. Clarke, T. Moyron, L. Smith regarding GNMA language for Repo Order (.2); communications and phone call with T. Moyron regarding Customers 559 motion (.2).

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07/22/22	C. Montgomery	5.40	6,534.00	B230	Draft changes to Schedule 1 Freddie Mac Adequate assurances stipulation (.7); communications with L. Macksoud regarding warehouse lender adequate protection and 506(c) waiver requests (.3); zoom call with counsel for Customers Bank, Fannie Mae, Freddie Mac regarding Customers Bank cash segregation motion including T. Kelly, E. Schnabel, J. Taylor, S. Warren, E.L. Smith, T. Moyron and others (.5); cash management calls with T. Meerovich, L. Macksoud, J. Krasne, M. Hyland and others (1.0); phone conference with L. Macksoud regarding final cash management order (1.2); review revisions to cash management documentation and further communications with L. Macksoud (.4); phone call with L. Macksoud regarding Flagstar Cash Flow DIP order comments (.5); communications with C. O'Leary regarding formal demand for warehouse lender accounting (.1); zoom call with USDOJ regarding GNMA extension request and related matters including L. Lerman, T. Moyron,, S. Maizel (.6); review of Barclays proposed changes to Final DIP Repo order in light of GNMA comments (.3); communications with T. Moyron re same (.1).
07/22/22	T. Moyron	0.30	237.00	B230	Zoom meeting with Freddie and Customers re Customers Motion.
07/22/22	T. Moyron	0.50	395.00	B230	Call with L. Macksoud, S. Maizel, et al. re TCB and other issues.
07/22/22	T. Moyron	0.90	711.00	B230	Call with T. Meerovich, L. Macksoud re accounts, DACAs, and other issues related to cash management and warehouse lenders.
07/22/22	T. Moyron	0.20	158.00	B230	Conference call with counsel for Customers and Fannie Mae re Customers second motion.
07/22/22	T. Moyron	1.40	1,106.00	B230	Analyze letters from GNMA (.7); conference call with T. Ramm re same (.1); analyze issues related to 525 and case law (.6).

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07/22/22	T. Moyron	1.00	790.00	B230	Analyze open matters related to schedule to Freddie Mac stipulation (.2); analyze stipulation and redline re Freddie Mac (.2) and prepare email to counsel for Freddie Mac (.1); correspond with C. Montgomery re same (.2); analyze emails from A. Samples re Freddie Mac (.1); correspond with T. Meerovich, et al., emails re request for confirmation from Freddie Mac (.2).
07/22/22	C. O'Leary	3.10	2,635.00	B230	Plan/prepare for/conduct TC Customers Bank and Reed smith, Freddie's counsel, re: motion to segregate and 559 motion (0.4); Exchange correspondence re: JSACA Amendment and refinancing of pre-petition bridge loans (0.6); Preparation of JSACA Amendment and exchange correspondence re: the same (2.1).
07/22/22	C. O'Leary	3.10	2,635.00	B230	Review/analyze comments to final DIP Orders and exchange correspondence re: the same (0.6); plan/prepare for/conduct TC FTI and T. Moyron re: warehouse lender sale transactions and settlements (0.7); preparation of letter to TCB's counsel re: liquidation of loans and collateral accounts and exchange correspondence re: the same (1.8).
07/22/22	C. O'Leary	1.40	1,190.00	B230	Plan/prepare for/conduct TC FTI and T. Moyron re: master open items and financing facilities (0.8); review/analyze GNMA notices defaults and comments to DIP Orders and exchange correspondence re: the same (0.6).
07/22/22	T. Moyron	0.60	474.00	B230	Correspond with C. O'Leary, et al. re Barclays refinancing and JSACA Amendment (.2); correspond with T. Meerovich, et al., re same (.2); analyze related issues (.2).
07/22/22	T. Moyron	0.10	79.00	B230	Analyze emails from T. Kelly re inquiries for FGMC re subservicer.
07/22/22	T. Moyron	0.40	316.00	B230	Analyze emails from C. Vacante et al. re labor matter inquiry (.2); analyze email from T. Becker re labor communication (.2).
07/22/22	T. Moyron	0.30	237.00	B230	Analyze various comments on cash flow DIP order and redlines.

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07/22/22	D. Cook	2.60	1,612.00	B230	Zoom conference with Debtor professionals regarding outstanding DIP issues (.5); draft reply ISO Cash Flow DIP Motion (2.1).
07/22/22	T. Moyron	2.50	1,975.00	B230	Prepare emails to B. Kotliar, et al., re DIP Repo order. (.2); correspond with L. Smith re Note, GNMA, and other matters (.3); analyze emails from T. Kelly, et al., re Amended and Restated Joint Securities Account Control Agreement and correspond re same (.4); analyze issues raised by GNMA regarding exemption and related issues (.6); correspond with T. Meerovich re Committee call (.3); analyze updated Freddie stipulation and redlien (.2); prepare mail to O. Alaniz re same (.2); analyze proposed comments to cash management and correspond with L. Macksoud same (.3).
07/22/22	E. Smith	0.90	922.50	B230	Confer with representatives of prepetition lender and cash flow DIP lender regarding funding needs and asset sales.
07/22/22	E. Smith	0.40	410.00	B230	Attended call with DOJ, Leah + Augie, and Dentons, T. Moyron, FGMC, T. Ramm, regarding FGMC management and funding of existing locked loans, and our request for a short term extension of our authority to create GNMA loan pools.
07/22/22	E. Smith	1.00	1,025.00	B230	Confer with Delaware counsel regarding today's developments on Day 2 order negotiations, financing work streams, loan servicing and asset disposal.
07/22/22	E. Smith	0.50	512.50	B230	Reviewed and discussed creditor comments on form of final cash collateral order with C. Montgomery and L. Macksoud.
07/22/22	E. Smith	0.50	512.50	B230	Review and prepare correspondence regarding GSE and GNMA securitization license usage and retention negotiations.
07/22/22	E. Smith	0.40	410.00	B230	Review plan to transfer loans funded with prepetition bridge loan to Barclays post-petition DIP repo line (.2); confer with counsel for bridge lender regarding steps to completion of loan transfers (.2).

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07/22/22	E. Smith	0.40	410.00	B230	Reviewed and prepared correspondence with counsel for cash flow DIP lender, B. Oppenheimer, and Dentons team, T. Moyron, for transfer of mortgage loans originated immediately prior to the petition date to Barclays DIP warehouse repo (0.4).
07/22/22	E. Smith	1.30	1,332.50	B230	Attended call with representatives of Customers, T. Kelly, Freddie Mac and counsel, and Dentons team, T. Moyron, regarding Customers motion for 559 recognition or lift stay relief (0.30); circulated remittance allocation summaries to repo buyers (0.8); attended call with counsel for Customers, T. Kelly, and FNMA, S. Warren, and C. Montgomery regarding Customers cash collateral and 559 motions (0.2).
07/22/22	E. Smith	0.30	307.50	B230	Review and prepare correspondence with FGMC accounting staff regarding delivery of shares of subservicer remittance for June to warehouse repo buyers (0.3); review and prepare correspondence with FMGC internal counsel and Dentons team, T. Moyron, regarding subservicing instructions (0.40).
07/22/22	J. Nelson	1.30	884.00	B230	Prepare draft of the JSACA Amendment.
07/23/22	E. Smith	0.40	410.00	B230	Reviewed proposed claim settlement term sheet.
07/23/22	C. Montgomery	2.20	2,662.00	B230	Review changes to final cash flow DIP order (.1); communication with T. Meerovich regarding evidence for Repo hearing (.1); communications and phone calls with L. Macksoud re cash management order and customers bank issues (.4); communications with T. Moyron , J. Krasne and O. Alaniz regarding Freddie Mac stipulation schedule 1 and settlement (1.3); review draft objections to DIP orders sent by Committee and communications with T. Moyron and T. Meerovich re same (.2); communications with L. Macksoud, T. Moyron and C. O'Leary regarding FNMA cash and TCB account transfer (.1).

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07/23/22	C. O'Leary	2.30	1,955.00	B230	Exchange correspondence re: Fannie buy up amounts and movement of the same (0.4); preparation of MSR sale motion and declaration in support and exchange correspondence re: the same (1.3); review/analyze final cash management order and exchange correspondence re: the same (0.3); exchange correspondence re: plan term sheet and creditors committee objection (0.3).
07/24/22	C. O'Leary	2.20	1,870.00	B230	Review/analyze Ginnie Mae ROR provisions to be included in DIP Orders and exchange correspondence re: the same (1.3); exchange correspondence re: refinancing of pre-petition bridge funded loans (0.3); review/analyze Customers' comments to JSACA Amendment and exchange correspondence re: the same (0.6).
07/24/22	T. Moyron	0.90	711.00	B230	Zoom meeting regarding cash flow DIP with C. Montgomery, N. Peterson, et al.
07/24/22	T. Moyron	0.70	553.00	B230	Zoom meeting with L. Macksoud, C. Montgomery, et al. re cash flow DIP and cash management.
07/24/22	T. Moyron	0.40	316.00	B230	Telephone call with C. Montgomery regarding second-day hearing.
07/24/22	T. Moyron	0.40	316.00	B230	Zoom meeting with DOJ, C. Montgomery, et al.
07/24/22	T. Moyron	0.80	632.00	B230	Zoom meeting with L. Smith, et al., re segregation and repo DIP funding.

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07/24/22	C. Montgomery	6.40	7,744.00	B230	Communications with T. Moyron re REPO DiP order changes (.1); Zoom call with N. Peterman, D. Duerdoth, L. Macksoud, T. Moyron re cash flow DIP final order (.9); review DIP lender organization chart and communications with T. Moyron regarding prepetition guaranty (.1); zoom call T. Moyron, L. Macksoud, S. Maizel re cash management and cash flow DIP (.7); phone call with T. Moyron regarding Thursday hearing issues (.4); communications with L. Smith and G. Miller regarding Freddie stipulation schedule (.2); zoom call L. Lerner, T. Moyron and L. Macksoud regarding GNMA DIP orders (.4); zoom call E.L. Smith re cash management segregation and DIP repo loan funding (.8); communications with B. Clarke regarding most recent version of DIP Repo order And update same for GNMA (1.9); zoom call with T. Meerovich, E.L. Smith, J. Krasne, M. Hyland and T. Moyron re Barclays loan funding update and cash management (.6); phone call E.L. Smith re GNMA footnotes from Barclays and Waivers(.4).
07/24/22	T. Moyron	0.20	158.00	B230	Call with W. Nolan et al. regarding call with Committee advisors, pipeline, and other matters.
07/24/22	T. Moyron	0.20	158.00	B230	Call with S. Warren re FNMA matters regarding funds deposited into account and transfer and matters related to coordination.
07/24/22	E. Smith	2.30	2,357.50	B230	Confer with Dentons team, T. Moyron, and FTI team, T. Meerovitch, regarding terms of final cash management order (1.5) and loan transfers to DIP repo line (0.8).
07/24/22	E. Smith	1.50	1,537.50	B230	Confer with Dentons team, T. Moyron, and counsel for cash flow DIP lender regarding transfer of mortgage loans funded prepetition by bridge loan provider to DIP repo line (0.4); confer with FGMC, T. Ramm, FTI, T. Meerovitch, and Dentons, T. Moyron, regarding transfer of loans to DIP repo line (1.1).

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Date	Timekeeper	Hours	Amount	Task	Narrative
07/24/22	D. Cook	7.20	4,464.00	B230	Draft reply ISO Cash Flow DIP Motion (5.4); analysis regarding standard of review in connection with same (1.2); analysis with respect to previously filed declarations in support of same (.6).
07/24/22	S. Maizel	1.80	1,746.00	B230	Zoom conference with Greenberg Traurig, etc. re cash flow DIP order, etc. (1.0); conference call with T. Moyron, L. Macksoud, etc. re same (.8).
07/24/22	S. Maizel	1.00	970.00	B230	Zoom conference with UCC counsel, FTI, etc. re pending issues, including objections to cash flow DIP motion, etc. (.8); telephone conference with T. Moyron re same (.2).
07/25/22	C. Montgomery	4.50	5,445.00	B230	Communications with L. Lerner regarding Final Repo DIP language comparison and annotations of same (.8); communications with A. Helman regarding GNMA issue (.1); phone call with A. Helman re section 525 cases (.2); zoom call with T. Moyron and T. Meerovich regarding Freddie settlement discussions (.5); communications with E Howe re DIP Order comparisons (.2); review T. Meerovich first Day Declaration for possible supplementation in connection with Final Order Dispute (.4); zoom call with P. Partee and B. Clarke, T. Moyron regarding committee position (.5); Communications with L. Macksoud, T. Moyron and others regard 559 reservation of Rights language (.7); zoom call With L. Macksoud regarding same (.5); participate in Zoom call with N. Peterman, L. Macksoud, T. Moyron re Cash Flow DIP order and budget (.5).

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07/25/22	D. Cook	12.40	7,688.00	B230	Video conference with Dentons and FTI professionals regarding second day hearing including preparation for defense of DIP motions (.4); Video conference with Dentons and FTI professionals regarding second day hearing including UCC DIP objection (2.3); telephone conference with T Moyron regarding DIP Reply (.1); follow up telephone conference with T. Moyron regarding same (.1); additional follow up telephone conference with T Moyron regarding same (.1); analyze UCC DIP objection in connection with preparation of DIP reply (1.8); revise DIP reply based on call and review of UCC DIP objection (2.7); draft DIP reply (4.4); Analysis with respect to C. O'Leary draft language for response to Customers Bank re 559 motion (.2); analysis regarding drafting pleading in connection with same (.2); analysis with respect to S Maizel revisions to C. O'Leary 559 response language (.1).
07/25/22	C. O'Leary	2.00	1,700.00	B230	Review/analyze comments to DIP Orders and exchange correspondence re: the same (0.6); exchange correspondence re: refinancing PIMCO loans (0.4); preparation of revised JSACA Amendment and exchange correspondence re: the same (0.6); preparation of Cash Management Order and exchange correspondence re: the same (0.4).
07/25/22	C. O'Leary	3.20	2,720.00	B230	Review/analyze Flow of Funds and Security Interest Release and exchange correspondence re: the same (0.4); review/analyze committee objection to DIP facilities and exchange correspondence re: the same (1.4); preparation of responsive pleading to 559 motion (1.4).
07/25/22	C. O'Leary	1.30	1,105.00	B230	Exchange correspondence re: JVB's exercise of remedies and TCB's requests for cooperation (0.7); review/analyze Freddie's comments to Cash Management Order and exchange correspondence re: the same (0.6).

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Date	Timekeeper	Hours	Amount	Task	Narrative
07/25/22	E. Smith	1.60	1,640.00	B230	Review and prepare loan transfer correspondence with counsel for DIP lenders and FGMC treasury officer arranging the transfers with DIP repo buyer (0.7); review and revise drafts of bridge lender security interest release and flow of funds agreement (0.9).
07/25/22	E. Smith	1.60	1,640.00	B230	Confer with counsel for mortgage loan subservicer and L. Macksood regarding 559/lift stay motion filed by pre petition warehouse lender (1.1); prepare and review correspondence with Dentons team regarding exchange with Rushmore representatives (0.5).
07/25/22	E. Smith	0.80	820.00	B230	Attended scheduled funding and operations workstream call with representatives of cash flow DIP lender, N. Peterson, FTI, T, Meerovitch, and Dentons, T. Moyron.
07/25/22	S. Maizel	1.50	1,455.00	B230	Zoom conference with Bridge Lender representatives, Greenberg attorneys, FTI, etc. re plan term sheet, objections to DIP lending motion, etc. (.9); telephone conference with T. Moyron and FTI re same (.6) .
07/25/22	S. Maizel	1.50	1,455.00	B230	Zoom conference with FTI, etc. re UCC objections to DIP Financing motions (1.0); zoom conference with T. Meerovich, etc. re same (.5).
07/25/22	S. Maizel	3.00	2,910.00	B230	Zoom conference with T. Meerovich, W. Nolan, C. Montgomery, T. Moyron, etc. re UCC objections to DIP Financing Motions (2.0); research re UCC objection to "roll up" provisions in DIP financing (1.0) .
07/25/22	E. Smith	0.80	820.00	B230	Confer with counsel for cash flow DIP lender, N. Pederman, and Dentons team, T. Moyron, regarding comments on proposed order from other parties in interest.
07/25/22	S. Maizel	0.70	679.00	B230	Zoom conference re Freddie Mac issues with Freddie Mac's counsel, FTI, etc.

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07/25/22	E. Smith	0.90	922.50	B230	Reviewed and prepared correspondence with FTI, T. Meerovitch, and counsel for lenders, B. Oppenheimer and S. Daily, regarding mortgage loan transfers onto Barclays DIP repo line (0.9); confer with B. Oppenheimer regarding loans being transferred to Barclays line (0.3).
07/25/22	T. Moyron	0.40	316.00	B230	Zoom meeting with K. Zinman, L. Macksoud, et al., re cash management order, including paragraph 14.
07/25/22	T. Moyron	0.40	316.00	B230	Call with M. Indelicato, L. Macksoud, and A. Abramova re cash management order.
07/25/22	T. Moyron	0.60	474.00	B230	Call with T. Meerovich, cash flow DIP lender and its advisors, including N. Peterman., et al. re status of pipeline and other pending matters.
07/25/22	T. Moyron	1.50	1,185.00	B230	Teams meeting with T. Meerovich, C. Montgomery, et al. re preparation for Committee objection (1.0) and then follow up regarding same (.5).
07/25/22	T. Moyron	0.80	632.00	B230	Analyze Committee objection to motion to approve Repo and cash flow DIP financing (.4) and further review of same (.4).
07/25/22	T. Moyron	0.10	79.00	B230	Correspond with L. Jones regarding case law re insider transactions.
07/25/22	T. Moyron	0.60	474.00	B230	Call with W. Nolan, T. Meerovich and S. Maizel re proposal to extend milestones, budget, and related issues.
07/25/22	T. Moyron	0.10	79.00	B230	Correspond with A. Samples re FNMA.
07/25/22	T. Moyron	0.10	79.00	B230	Prepare email to O. Alaniz re term sheet request.
07/25/22	T. Moyron	2.30	1,817.00	B230	Teams meeting with T. Meerovich, C. Montgomery, and others on FTI and Dentons team re Committees's objection, response, and matters related to upcoming hearing.
07/25/22	T. Moyron	1.20	948.00	B230	Call with N. Peterman, L. Macksoud and E. Howe regarding Committee's objection, milestones, and other related matters (.8); and follow up call with L. Macksoud re same (.4).

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07/25/22	T. Moyron	0.50	395.00	B230	Call with D. Oien regarding Committee objection, employee resignation, upcoming hearing and other matters.
07/26/22	T. Moyron	0.80	632.00	B230	Analyze issues related to cash management order and status (.2); analyze issues related to responses and prepare same to Customers' motions (.4) and correspond with D. Cook re same (.2).
07/26/22	T. Moyron	0.10	79.00	B230	Correspond with E. Howe regarding GNMA language re cash flow DIP order.
07/26/22	T. Moyron	0.60	474.00	B230	Call with L. Macksoud and C. Montgomery re GNMA language, cash management order, and other issues.
07/26/22	T. Moyron	0.50	395.00	B230	Correspond with M. Caloway re agenda and exhibits (.3); analyze agenda and exhibit list (.1); call with C. Montgomery re same (.1).
07/26/22	T. Moyron	0.30	237.00	B230	Call with A. Samples regarding labor matters, FNMAE, and upcoming hearing.
07/26/22	T. Moyron	0.10	79.00	B230	Correspond with L. Lerman re objection deadline re cash flow DIP order.
07/26/22	T. Moyron	0.20	158.00	B230	Analyze emails from J. Krasne, et al., regarding Barclays refinance.
07/26/22	T. Moyron	0.20	158.00	B230	Analyze emails from O. Alaniz and S. Warren regarding additional language in DIP orders.
07/26/22	T. Moyron	0.20	158.00	B230	Analyze emails from T. Meerovich, et al., regarding TCB and status of charges to the repo lenders.
07/26/22	T. Moyron	0.10	79.00	B230	Analyze email from N. Peterman re call regarding GNMA.
07/26/22	T. Moyron	0.50	395.00	B230	Participate in Zoom meeting with C. Montgomery et al. re repo lenders and waivers.
07/26/22	T. Moyron	0.20	158.00	B230	Call with M. Hyland and T. Meerovich re information requests.

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07/26/22	E. Smith	1.50	1,537.50	B230	Assist L. Macksoud with revisions to draft cash management and financing orders (1.3); review and prepare correspondence regarding preparation of agenda for financing hearing (0.20).
07/26/22	E. Smith	1.90	1,947.50	B230	Confer with counsel for DIP lenders, S. Daily and B. Oppenheimer, FTI, J. Krasne, Dentons team, T. Moyron, and FGMC, A. Samples, regarding transfer of loans to DIP repo line.
07/26/22	E. Smith	1.80	1,845.00	B230	Confer with Dentons team, T. Moyron and C. Montgomery, and FGMC, A. Samples, and FTI, T. Meerovitch, regarding 506(c) and credit support questions arising from recent interactions with warehouse providers.
07/26/22	E. Smith	0.70	717.50	B230	Confer with counsel for Customers Bank, T. Kelly, Dentons team, T. Moyron, and FGMC, A. Samples and T. Ramm, regarding loan sale strategies.
07/26/22	T. Moyron	1.40	1,106.00	B230	Analyze comments and proposed language from L. Lerman, S. Warren, counsel for warehouse lenders regarding comments on DIP Orders (1.2); prepare emails to L. Lerman, et al., re same (.2).
07/26/22	T. Moyron	0.60	474.00	B230	Review analysis related to potential waivers re DIP Orders and adequate protection (.4); correspond with L. Macksoud re same (.2).
07/26/22	T. Moyron	0.70	553.00	B230	Correspond with A. Samples and S. Lindblom re closing schedule (.3); analyze excel sheets re pipeline and closing schedule (.2); correspond with N. Sombuntham and J. Krane re closing schedule (.2).
07/26/22	T. Moyron	0.20	158.00	B230	Correspond with O. Alaniz re call and pending matters.
07/26/22	T. Moyron	0.30	237.00	B230	Zoom meeting with E. Howe, et al. re GNMA language.
07/26/22	T. Moyron	0.10	79.00	B230	Call with A. Samples re request for closing schedule from Committee.

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07/26/22	E. Smith	0.40	410.00	B230	Reviewed DIP repo line MRA provisions relating to fees and interest, and prepared summary.
07/26/22	E. Smith	2.70	2,767.50	B230	Confer with FTI team, T. Meerovitch, and Dentons team, T. Moyron, to make final decisions on open financing order issues and to prepare for 7/27 meeting with UCC and professional advisors.
07/26/22	T. Moyron	0.30	237.00	B230	Analyze updated cash management order and redlines.
07/26/22	T. Moyron	0.10	79.00	B230	Analyze notice of event of default and demand for payment re Customers Bank.
07/26/22	T. Moyron	0.10	79.00	B230	Analyze email from S. Warren re custodial accounts.
07/26/22	T. Moyron	0.20	158.00	B230	Analyze emails from M. Hyland, et al., re BRG requests and transmission of information.
07/26/22	T. Moyron	0.10	79.00	B230	Analyze email from M. Hyland re reporting to DIP cash flow lender.
07/26/22	D. Cook	11.80	7,316.00	B230	Draft response to Customers Bank 559 pleading (2.1); analysis with respect to response deadline in connection with same (.2); email communications with Dentons team regarding 559 pleading (.3); revise same with respect to S Maizel comments (.1); draft response to Customers Bank motion to segregate cash collateral (2.3); email communications with Dentons and PSZJ regarding same (.3); analyze M Litvak research concerning DIP standard of scrutiny (.5); revise DIP Reply in accordance with Debtor team comments (4.6); analyze UCC objection to DIPs with respect to same (1.4).
07/26/22	S. Maizel	1.50	1,455.00	B230	Telephone conference with FTI, etc. re preparation for hearing on cash flow DIP hearing, etc.
07/26/22	S. Maizel	0.30	291.00	B230	Review and respond to emails re Customers reach out to Board members.
07/26/22	S. Schrag	0.50	325.00	B230	Review correspondence regarding final cash collateral and DIP orders.

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07/26/22	C. O'Leary	3.10	2,635.00	B230	Preparation of Response to Customers 559 Motion and exchange correspondence re: the same (0.8); preparation of Cash Management Order with respect to DBNTC accounts and exchange correspondence re: the same (0.9); exchange correspondence re: FGMC's discussions with Fannie Mae (0.7); plan/prepare for/conduct TC T. Moyron and L. Macksoud re: Customers comments to Cash Flow DIP Order (0.7).
07/26/22	C. O'Leary	3.30	2,805.00	B230	Plan/prepare for/conduct TYC T. Moyron and Greenberg Traurig re: comments to DIP Cash Flow Order (0.67); plan/prepare for/conduct TC FTI and FGMC re: incurrence of costs and surcharge issues and preparation of memo re: Customers cash collateral account (1.8); review/analyze comments to JSACA Amendment 2 and exchange correspondence re: the same (0.3); review/analyze Customers Notice of Default to Lakeview and exchange correspondence re: the same (0.3) ; review/analyze A&R Guaranties related to execution of MSFTA (0.3).
07/26/22	C. O'Leary	2.50	2,125.00	B230	Plan/prepare for/conduct TC FTI and T. Moyron re: open critical issues and financing facilities (1.9); exchange correspondence re: Cash Flow DFIP Order (0.3); review/analyze revised 559 Customers Order and exchange correspondence re: the same (0.3).

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07/26/22	C. Montgomery	8.90	10,769.00	B230	Communications with L. Macksoud, T. Moyron re 506(c) waivers in cash flow DIP (.1); review Exhibit and Witness List and suggest revisions to same (1.2); review draft response to 559 motion and respond to same (.4); continue drafting supplemental FTI declaration (3.7); zoom call L. Macksoud and T. Moyron regarding GNMA language issues for both DIP orders and 506(c) issues For Customers and Flagstar (.6); communications with T. Moyron regarding extension of hearing date (.1); communications with L. Macksoud regarding Customers Bank surcharge issues (.1); communications with O. Alaniz regarding Freddie Mac comments (.5); zoom call with T, Moyron, L. Macksoud, C. O'Leary regarding Customers 506(c) waiver request (.6); phone call L. Smith re same (.3); zoom call with N. Peterman, E. Howe regarding , C. O'Leary, others regarding DIP Lender request for further modification of GNMA proposed language (.4); zoom call with J. Krasne, T. Ramm, C. O'Leary, L. Macksoud, T. Moyron, regarding Customers waiver threat ( .5); continuation of call with L. Macksoud and C. O'Leary(.4).
07/26/22	C. Montgomery	4.00	4,840.00	B230	Post 3:45 pm communications with M. Litvak regarding theory of response to Committee objection (.2); continued drafting Meerovich Supplemental Declaration (.2); review draft GNMA language from E. Howe for Cash Flow DIP Facility (.1); communications with C. O'Leary, L. Smith, and L. Macksoud regarding Customers Bank 506(c) issues (.8) communications regarding GSE language in Cash Flow DIP Order (.2); communications with S. Warren regarding custodial accounts identified by Fannie Mae (.1); round up GSE comments on Final Repo DIP Order(.4); phone call with L. Macksoud re same (.3); communications with B. Clarke re same (.2); update Repo DIP Order for latest GSE revisions from Warehouse lenders and the GSE counsel (1.5).

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07/27/22	C. Montgomery	0.80	968.00	B230	Post 6pm communications with L. Macksoud regarding adequate protection request for Flagstar (.3); review GNMA termination notice and communications with T. Moyron re same (.5).
07/27/22	C. Montgomery	4.60	5,566.00	B230	Update Repo DIP Order for latest GSE revisions from Warehouse lenders and the GSE counsel (2.0 ); communications with L. Lerner, B. Clarke, T. Moyron, P. Moak, O. Alaniz, re same (1.2); communications with T. Moyron regarding Guaranty of Customers working Capital Line and Rushmore deal (.1); communications regarding Customers 559 order revisions with M. Calloway, T. Moyron, L. Macksoud and others (.1); revise draft Meerovich Supplemental Declaration (.4); review filed objections and reservations of rights from USDOJ, Customers, Flagstar, Fannie Mae (.2); communications with L. Macksoud, L. Smith and C. O'Leary regarding Customers and Rushmore deal on 559 issues and revised order (.2); phone call with L. Macksoud regarding Flagstar 506(c) issues (.4).
07/27/22	C. O'Leary	2.20	1,870.00	B230	Review/analyze Fannie's comments to Proposed 599 Order and exchange correspondence re: the same (0.4); exchange correspondence re: JSACA Amendment (0.3); review/analyze Flow of Funds re: PIMCO refinancing and exchange correspondence re: the same (0.4); Preparation of comments to Proposed 599 Order and exchange correspondence re: the same (0.9); exchange correspondence re: Lakeview notice of default (0.2).
07/27/22	C. O'Leary	2.20	1,870.00	B230	Review/analyze objections and responsive pleadings to DIP Motions, Cash Management Motion and 559 Motion (1.2); exchange correspondence re: Rushmore Subservicing Agreement (0.7); review/analyze 559 Order and exchange correspondence re: the same (0.3)

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07/27/22	C. O'Leary	1.30	1,105.00	B230	Review/analyze BSI MSR Letter of Intent and exchange correspondence re: the same (0.9); review/analyze Ginnie Notice of Default and exchange correspondence re: the same (0.4).
07/27/22	T. Moyron	0.00	0.00	B230	Teams meeting with T. Meerovich, L. Smith, and representatives and advisors of Rushmore, Customers, et al. re payment and go-forward mechanics of payments, reconciliation, etc. (No Charge)
07/27/22	T. Moyron	0.40	316.00	B230	Conference call with S. Warren, et al., re FNMA language in orders.
07/27/22	T. Moyron	0.30	237.00	B230	Call with L. Macksoud re status of DIP orders and remaining issues.
07/27/22	T. Moyron	1.60	1,264.00	B230	Analyze correspondence from counsel for warehouse lenders, DIP lenders, and agencies regarding DIP orders and language changes thereto.
07/27/22	T. Moyron	0.80	632.00	B230	Analyze Repo DIP Order changes.
07/27/22	T. Moyron	0.40	316.00	B230	Analyze plan milestones and timeline and related request for extension.
07/27/22	S. Maizel	1.00	970.00	B230	Analyze GNMA July 27th notice of violation and related issues.
07/27/22	S. Maizel	0.50	485.00	B230	Zoom conference with M. Schwarzmann, FTI, A. Samples, etc. re financing issues.
07/27/22	E. Smith	1.20	1,230.00	B230	Reviewed revised loan transfer documentation, and reviewed and prepared correspondence regarding agreement execution and other preparation for funding of loan transfer to DIP repo line; confer with counsel for cash flow DIP lender; review form of new note for new advance under cash flow DIP loan.
07/27/22	E. Smith	0.70	717.50	B230	Review comments on financing order drafts, responses to objections and Customers Bank 559/lift stay motion.

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07/27/22	E. Smith	0.80	820.00	B230	Participate in call among FGMC/FTI, T. Meerovitch, representatives of Customers Bank, T. Kelly, and Rushmore, J. Grebinar, regarding handover of loan remittance responsibilities relating to loans on Customers Bank warehouse line from FGMC to Rushmore and Customers Bank.
07/27/22	E. Smith	0.90	922.50	B230	Attended post-petition financing call with cash flow DIP lender, FTI, T. Meerovitch, and Dentons, T. Moyron.
07/27/22	E. Smith	0.30	307.50	B230	Reviewed copy of GNMA notice of violation received this afternoon by FGMC.
07/27/22	D. Cook	1.70	1,054.00	B230	Email correspondence with T Moyron regarding DIP Reply (.1); revise same (.7); email correspondence with L Macksoud regarding Customers 559 motion (.2); analyze email analysis from capital markets group with respect to same (.2); analyze response to Customers 559 motion (.3); analyze response to motion to segregate collateral regarding same (.2).
07/27/22	T. Moyron	0.50	395.00	B230	Teams meeting with M. Schwarzmman, N. Peterman, FTI, S. Maizel et al., regarding status of pipeline and case matters, including continued hearing and related issues.
07/28/22	E. Smith	1.10	1,127.50	B230	Confer with L. Macksoud regarding comments on proposed final financing orders and 559 order (0.9); reviewed proposed new 559 order language (0.2).
07/28/22	D. Cook	6.30	3,906.00	B230	Telephone conference with L Macksoud regarding DIP Reply (.7); revise same particularly with respect to preliminary statement/narrative concerning same (3.7); revise section 559 response (.4); email communications with M Caloway regarding same (.2); telephone conference with M Caloway regarding same (.1); email correspondence with L Macksoud regarding same (.3); analysis regarding DIP waiver parameters (.9).

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07/28/22	S. Maizel	2.20	2,134.00	B230	Zoom conference with M. Schmergel, US DOJ, etc. re GNMA issues (1.5); drafting analysis of GNMA July 27 notice of violation (.6); email to N. Peterman, GT, re GNMA meeting (.1) .
07/28/22	S. Maizel	0.80	776.00	B230	Analyzing issues related to GNMA July 27th notice of violation.
07/28/22	S. Maizel	0.90	873.00	B230	Zoom conference with T. Meerovich, C. Montgomery, etc. re preparation for hearing on UCC objection to DIP Financing motions.
07/28/22	T. Moyron	0.50	395.00	B230	Call with L. Macksoud and L. Jones regarding waivers in DIP order and hearing preparation.
07/28/22	T. Moyron	0.50	395.00	B230	Call with L. Macksoud regarding DIP order, waivers, etc.
07/28/22	T. Moyron	0.20	158.00	B230	Call with L. Jones re preparation for upcoming hearing.
07/28/22	E. Smith	1.60	1,640.00	B230	Attended call with representatives of DOJ regarding agency positions on financing orders and collateral segregation.
07/28/22	E. Smith	1.30	1,332.50	B230	Confer with FTI, J. Krasne, and counsel for bridge lender, B. Oppenheimer, regarding documentation for loan transfers (0.6); reviewed and prepared correspondence regarding loan transfer process (0.3); reviewed final security interest release and funds flow (.2); reviewed interest calculation terms of bridge loan secured note.
07/28/22	T. Moyron	0.60	474.00	B230	Analyze matters related to Freddie Mac re status, term sheet, etc.
07/28/22	C. O'Leary	1.40	1,190.00	B230	Plan.prepare for/conduct TC T. Moyron and L. Smoith re: BSI MSR Sale (0.8); review/analyze BSI LOI and exchange correspondence re: the same (0.6).
07/28/22	C. O'Leary	3.90	3,315.00	B230	Preparation of comments to BSI Letter of Intent to purchase MSR and exchange correspondence re: the same.

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Date	Timekeeper	Hours	Amount	Task	Narrative
07/28/22	C. O'Leary	2.40	2,040.00	B230	Plan/prepare for/conduct TC T. Moyron , FTI and FGMC re: BSI LOI (0.8); review/analyze PIMCO loan refinancing deliverables and exchange correspondence re: the same (0.8); Plan/prepare for/conduct OC L. Harrison and G. Miller re: MSR Sale Motion. (0.8)
07/28/22	C. O'Leary	2.80	2,380.00	B230	Review/analyze 559 Proposed Order and exchange correspondence re: the same (1.2); TC Pete Siddiqui, Katten, re: JVB servicing transfer and segregated accounts and exchange correspondence. (1.6).
07/28/22	T. Moyron	0.30	237.00	B230	Analyze emails from E. Howe, M. Schmergel, et al., regarding cash flow DIP order.
07/28/22	T. Moyron	0.20	158.00	B230	Analyze E. Kiernan, et al., emails re lenders release.
07/28/22	T. Moyron	0.50	395.00	B230	Conference call with T. Meerovich, G. Miller, et al., regarding Freddie Term Sheet.
07/28/22	T. Moyron	0.30	237.00	B230	Analyze B. Oppenheimer, L. Smith, et al. re loan transfers to Barclays repo line.
07/28/22	T. Moyron	1.20	948.00	B230	Conference call with T. Meerovich re contested final hearing and preparation and timing (.5), and calls with S. Maizel (.2), C. Montgomery (.3), and L. Macksoud (.2) regarding preparation and DIP outstanding issues and disputes.
07/28/22	T. Moyron	1.50	1,185.00	B230	Zoom meeting with M. Schmergel at DOJ regarding GNMA matters, including notices, extension, and other issues.
07/28/22	T. Moyron	0.40	316.00	B230	Call with P. Moak regarding Repo order re Freddie language.
07/28/22	T. Moyron	0.30	237.00	B230	Analyze matters related to critical vendor motion and status of Committee's objection (.2); call with D. Galfus re same (.1).
07/28/22	T. Moyron	0.10	79.00	B230	Analyze emails from J. Grebinar re Rushmore/Customers/FGMC and call.

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07/28/22	C. Montgomery	2.00	2,420.00	B230	Witness preparations for CRO, including communications with T. Moyron (.1); phone calls and communications with T. Moyron re timing and preparation issues (.2); review Committee information demand (.1); review FTI presentation to Committee (.5); revise Meerovich Declaration(1.1).
07/28/22	C. Montgomery	5.20	6,292.00	B230	Communications with J. Taylor regarding OMM requests for changes to Repo Order.(.4); communications with T. Moyron Repo And Cash Flow deadlines (.7); previously deleted; prepare for and participate on zoom call with O. Alaniz regarding Freddie language changes to Final DIP Repo order (.6); communications with B. Clarke regarding updated Repo Order (. 5); communications with M. Schmergel at USDOJ re same for GNMA (.5); phone conference with L. Macksoud regarding Flagstar 506(c) issues and adequate protection (.9); phone call regarding continuing effort to achieve debtor agreement (.1); communications with T. Meerovich, T. Ramm and T. Moyron regarding DB distributions to Customers and others (.1); communications with L. Macksoud re fresh demand from Customers regarding 506(c)(1.1); communications with J. Taylor and OMM team regarding Repo Order (.3).
07/28/22	T. Moyron	1.90	1,501.00	B230	Analyze pleadings, objections, and reservations of rights filed by parties in interest related to first day motions and Customers 559 motion (1.1); analyze additional comments to orders (.3); analyze supplemental T. Meerovich declaration (.5).
07/29/22	S. Maizel	0.40	388.00	B230	Review and respond to emails re GNMA requests for information.
07/29/22	C. O'Leary	0.90	765.00	B230	Plan/ prepare for/conduct telephone conference with Glenn Siegel, Morgan Lewis, re: DBNTC Custodial Agreement and Customers 559 motion and exchange correspondence re: the same.

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Date	Timekeeper	Hours	Amount	Task	Narrative
07/29/22	S. Maizel	0.70	679.00	B230	Zoom conference with M. Schwarzmann, N. Peterman, T. Meerovich, etc. re financing issues, etc.
07/29/22	G. Medina	1.10	396.00	B230	Research cases in Delaware and New York at the request of D. Cook regarding DIP replies filed with the court addressing the appropriateness of the releases provided in the Cash Flow DIP, Proposed Collateral packages, DIP fees and Cash Flow DIP interest rate, Cash Flow DIP Budget, Limitations on the Lien Challenges and the DIP Milestones (0.9); send results to D. Cook and L. Macksoud (0.2).
07/29/22	E. Smith	0.40	410.00	B230	Confer with L. Macksoud regarding transfer of loan servicing expenses from FGMC to warehouse providers.
07/29/22	E. Smith	0.70	717.50	B230	Prepare timeline of refinancing challenges for FGMC prior to bankruptcy; confer with Dentons team, C. Montgomery, regarding events on the timeline.
07/29/22	C. Montgomery	7.50	9,075.00	B230	Continued drafting of supplemental Meerovich Declaration (1.1); communications regarding JVB purchased asset sales (.1); review Fannie Mae reservation of rights regarding Customers 559 Motion (.1); create prep outline for Meerovich and participate in Zoom witness prep session with T. Meerovich (4.1); communications with L. Macksoud and T. Moyron regarding Customers 559 call (.1); Zoom call with G. Miller and B. Nolan regarding Freddie Mac term sheet (.6) ; communications with B. Clark and T. Moyron regarding motion to seal (.1); communications with C. Quian and T. Moyron regarding JVB (.1); communications with B. Clarke, T. Moyron and M. Caloway regarding Repo DIP Side Letter motion To deal (.1); communications with J. Taylor and T. Moyron regarding Fannie Mae Repo DIP changes (.1); resume revisions to Meerovich Supplemental Declaration and discuss same with T. Moyron (1.0).

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Date	Timekeeper	Hours	Amount	Task	Narrative
07/29/22	S. Maizel	2.00	1,940.00	B230	Zoom conference with T. Meerovich, etc. re hearing on motion for cash flow DIP and Repo DIP.
07/29/22	S. Maizel	0.50	485.00	B230	Zoom conference with T. Meerovich, etc. re preparation for hearing on operational cash DIP motion, etc.
07/29/22	T. Moyron	1.20	948.00	B230	Analyze Freddie term sheet redlines reflecting various changes and updated clean term sheet (.4); conference call with G. Miller regarding next steps on Freddie term sheet (.1); correspond with D. Oien, et al., re term sheet (.4); conference call with D. Oien re same and other matters (.3).
07/29/22	T. Moyron	1.10	869.00	B230	Call with L. Macksoud regarding status of outstanding issues related to Customers motion and cash flow DIP order (.5); analyze emails from E. Schnabel, J. Beswenger, et al., re orders (.3); analyze emails from L. Macksoud and FGMC re waivers (.3).
07/29/22	T. Moyron	0.60	474.00	B230	Analyze email from M. Indelicato re Committee proposal (.1); prepare email to Board re Committee proposal (.1); prepare email to FTI, A. Samples, et al. re same (.1); analyze Committee proposal (.3).
07/29/22	T. Moyron	0.90	711.00	B230	Conference call with counsel for Customers and Flagstar and L. Macksoud regarding waivers and Customers motion (.5); conference call with L. Macksoud re resolution and follow up with CRO and FGMC for resolution (.4).
07/29/22	T. Moyron	0.50	395.00	B230	Conference call with D. Cook regarding DIP milestones and pending extension (.2); analyze language in DIP term sheet regarding related matters and mechanics related to Cash Flow Dip Lender remedies (.3).
07/29/22	T. Moyron	0.20	158.00	B230	Analyze emails from J. John, A. Helman, et al. re custodial funds.
07/29/22	T. Moyron	0.20	158.00	B230	Analyze emails from M. Litvak, et al., regarding KERP/KEIP.

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07/29/22	T. Moyron	0.40	316.00	B230	Calls with T. Meerovich (.2), (.2) re matters related to preparation for contested hearing and meeting with N. Peterman and M. Schwarzmann.
07/29/22	T. Moyron	0.70	553.00	B230	Conference call with T. Meerovich, S. Maizel, M. Schwarzmann, N. Peterman re budget, Barclays financing, and status of cases.
07/29/22	D. Cook	9.30	5,766.00	B230	Telephone conference with T Moyron regarding DIP milestones (.2); analyze Interim DIP Order with respect to same (.4); draft DIP reply with respect to releases (1.3); draft same with respect to collateral packages; draft same with respect to interest rate and fee (.4); draft same with respect to waivers (.8); draft same with respect to budget (.5); draft same with respect to lien challenges (.6); draft same with respect to milestones (1.3); revise same with respect to preliminary statement (1.2); research with regard to case law in support of reasonableness of DIP terms (2.6).
07/29/22	E. Smith	2.60	2,665.00	B230	Prepared communication with counsel for GNMA (0.70); confer with FGMC, A. Samples, T. Moyron and S. Maizel regarding same (0.70); confer with T. Moyron and respond to question from GNMA (1.2).
07/29/22	E. Smith	1.10	1,127.50	B230	Track correspondence on terms of final financing orders (0.3); confer with FTI, T. Meerovitch, FGMC, A. Samples, and Dentons team, L. Macksoud, regarding warehouse provider collateral surcharge issue under Bankruptcy Code Section 506(c) (0.8).
07/29/22	E. Smith	0.80	820.00	B230	Attended update call with cash flow DIP lender, N. Pederman, FTI, T. Meerovitch, FGMC, A. Samples, and Dentons team, T. Moyron.
07/30/22	T. Moyron	2.70	2,133.00	B230	Analyze and prepare reply to DIP Objections.

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07/30/22	T. Moyron	3.60	2,844.00	B230	Participate in Zoom meeting with T. Meerovich, M. Hyland, C. Montgomery, et al. re preparation for contested hearing, including objections to DIPs.
07/30/22	T. Moyron	0.30	237.00	B230	Call with L. Jones regarding KERP/KEIP, Committee proposal, and matters related to upcoming hearing.
07/30/22	C. Montgomery	6.10	7,381.00	B230	Review and revise supplemental Meerovich Declaration and exhibits (2.1); review E.L. Smith communication to M. Schmergel regarding funding pipeline (.2) ; prepare and participate in Zoom witness prep session for T. Meerovich (3.8).
07/30/22	E. Smith	0.20	205.00	B230	Review and prepare correspondence regarding GSE and Agency off take questions.
07/30/22	D. Cook	3.80	2,356.00	B230	Analyze DIP study in connection with fees and interest rates in other similar chapter 11 proceedings (3.2); draft DIP reply insert with respect to same (.6).
07/30/22	S. Maizel	3.60	3,492.00	B230	Zoom conference with T. Meerovich, N. Sombuntham, C. Montgomery, T. Moyron, etc. re preparation for hearing on motion for DIP Facilities.
07/30/22	S. Maizel	1.30	1,261.00	B230	Review and revise reply to UCC objection to DIP Facilities (1.0); telephone conference with T. Moyron re same (.1); review and respond to emails re same (.2).
07/30/22	C. O'Leary	1.20	1,020.00	B230	Exchange correspondence re: JVC-Signature bank remittances (0.4); review/analyze DBNTC responsive pleading to Customers 559 Motion (0.4); review/analyze revised BSI LOI and exchange correspondence re: the same (0.4)
07/31/22	C. O'Leary	0.30	255.00	B230	Exchange correspondence re: Customers 559 Proposed Order.
07/31/22	T. Moyron	3.50	2,765.00	B230	Zoom meeting with T. Meerovich, C. Montgomery, etc. re preparation for hearing on UCC objections to DIP Facilities motions.

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Date	Timekeeper	Hours	Amount	Task	Narrative
07/31/22	T. Moyron	0.30	237.00	B230	T/c with S. Maizel re reply to UCC objection to DIP Facilities motions.
07/31/22	T. Moyron	1.00	790.00	B230	Zoom conference with N. Peterman, Greenberg, etc. re DIP Lender responses to issues raised by UCC in objection to DIP Facilities motions.
07/31/22	T. Moyron	0.10	79.00	B230	Payments to insiders under the wage motion and related issues with S. Maizel re same.
07/31/22	T. Moyron	0.50	395.00	B230	Zoom conference with O. Alaniz, counsel for Freddie Mac, re issues raised by Customers 559 motion and related issues.
07/31/22	S. Maizel	3.50	3,395.00	B230	Zoom conference call with T. Meerovich, C. Montgomery, etc. re preparation for hearing on UCC objections to DIP Facilities motions.
07/31/22	S. Maizel	0.60	582.00	B230	Telephone conference with T. Moyron re reply to UCC objection to DIP Facilities motions (.3); review revised reply to UCC objections to DIP Facilities Motions (.3).
07/31/22	S. Maizel	1.00	970.00	B230	Zoom conference with N. Peterman, Greenberg, etc. re DIP Lender responses to issues raised by UCC in objection to DIP Facilities motions.
07/31/22	S. Maizel	0.80	776.00	B230	Zoom conference with O. Alaniz, counsel for Freddie Mac, re issues raised by Customers 559 motion and related issues (.5); review and respond to email from counsel for Freddie Mac re Customers 559 motion (.2); telephone conference with T. Moyron re same (.1).
07/31/22	T. Moyron	0.10	79.00	B230	Call with C. Montgomery (.1) and D. Cook (.1) re DIP facilities issues.
07/31/22	T. Moyron	3.40	2,686.00	B230	Analyze T. Meerovich declaration and redlines (.6) and prepare comments to same (.3); prepare and analyze reply in support of DIP motions (1.6); analyze comments to reply (.3); correspond with C. Montgomery, M. Litvak, et al., regarding filings re DIP facilities (.6).

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Date	Timekeeper	Hours	Amount	Task	Narrative
07/31/22	D. Cook	3.70	2,294.00	B230	Revise DIP Reply in connection with T. Moyron comments (.8); analyze supplemental Meerovich declaration for entry of material into DIP Reply (2.1); telephone conference with T. Moyron regarding DIP Reply (.1); revise DIP Reply with respect to PSZJ comments (.6); email communication with Lender counsel with respect to same (.1).
07/31/22	E. Smith	0.50	512.50	B230	Attended call with counsel for Freddi Mac, O. Alaniz, and Dentons team, T. Moyron, S. Maizel and L. Macksoud, to discuss questions on latest revisions to financing orders.
07/31/22	E. Smith	0.40	410.00	B230	Review proposed commitment schedule to add to cash flow DIP credit agreement (.2); prepare and review correspondence regarding same (.2).
07/31/22	C. Montgomery	8.40	10,164.00	B230	Prepare for and participate in Zoom witness preparation for T. Meerovich (3.5); Zoom call with S. Warren, J. Taylor and T. Moyron regarding adopting Ginnie and Freddie language changes (.5); phone call with T. Moyron regard PSZJ changes and questions for supplemental declaration and Draft revised declaration (1.7); phone call with N. Peterman, T. Moyron, S. Maizel (1.0); communications with O. Aniz regarding additional language in DIP Repo Order and Customers Bank 559 Order (.4); communications with T. Moyron regarding Meerovich supplemental Declaration (.5); communications with L. Macksoud regarding 559 order and Declaration issues (.8).
Subtotal		663.80	598,035.00		

B260 - Board of Directors Matters

Date	Timekeeper	Hours	Amount	Task	Narrative
06/30/22	T. Moyron	0.70	553.00	B260	Board call regarding filing, discussions with employees, etc.
06/30/22	S. Schrag	1.50	975.00	B260	Finalize consents (.7); participate in Board call and take notes (.8).

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Date	Timekeeper	Hours	Amount	Task	Narrative
07/01/22	T. Moyron	0.80	632.00	B260	Participate in meeting with Board, Company, and FTI after First-Day Hearings.
07/01/22	S. Schrag	0.60	390.00	B260	Participate in Board call and take notes.
07/01/22	G. Medina	0.30	108.00	B260	Correspond with S. Schrag and send FGMC and Maverick executed Board Resolutions to C. O'Leary and J. Nelson.
07/05/22	T. Moyron	0.80	632.00	B260	Attended meeting with the FGMC Board of Directors, S. Maizel, T. Meerovitch and others to review work streams, staffing and plans for fundings scheduled for this week.
07/05/22	S. Schrag	0.70	455.00	B260	Participate in Board call and take notes.
07/05/22	E. Smith	0.80	820.00	B260	Attended meeting with the FGMC Board of Directors, T. Moyron, S. Maizel, T. Meerovitch and others to review today's work streams, staffing and plans for fundings scheduled for this week.
07/05/22	S. Maizel	0.70	679.00	B260	Zoom call with Board, A. Samples, FTI, etc. re pending issues.
07/06/22	T. Moyron	1.00	790.00	B260	Zoom meeting with Board regarding updates on workstreams with respect to bankruptcy case and pending matters related to JVB, DB, and other matters.
07/06/22	E. Smith	1.10	1,127.50	B260	Attended meeting of FGMC Board of Directors with Dentons and FTI teams, including A. Samples, T. Myron, S. Maizel, and T. Meerovich.
07/06/22	S. Schrag	1.20	780.00	B260	Participate in Board Call and take notes (1.1); begin converting notes to minutes (.1).
07/06/22	S. Maizel	1.10	1,067.00	B260	Zoom call with Board, FTI, etc. re pending issues.
07/08/22	S. Maizel	1.00	970.00	B260	Telephone conference with Board, FTI, etc. re pending issues.
07/08/22	S. Schrag	1.00	650.00	B260	Participate in Board call and take notes.
07/08/22	E. Smith	1.40	1,435.00	B260	Attended meeting to update FGMC Board of Directors on recent events with T. Myron and S. Maizel; conferred with C. O'Leary regarding prepetition financing question from the Board (0.3).

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Date	Timekeeper	Hours	Amount	Task	Narrative
07/08/22	T. Moyron	1.00	790.00	B260	Participate in Board Meeting with Board, Company, FTI, and L. Smith.
07/12/22	E. Smith	1.40	1,435.00	B260	Participated in meeting of Board of Directors with T. Myron, S. Alberts and W. Nolan and T. Meerovitch, FTI.
07/12/22	S. Schrag	1.70	1,105.00	B260	Participate in Board call and take notes.
07/12/22	S. Alberts	1.70	1,683.00	B260	Board call to discuss KEIP and KERP .
07/12/22	T. Moyron	1.80	1,422.00	B260	Zoom meeting with Board, FTI, and Dentons regarding KERP/KEIP, warehouse lenders, and other pending issues.
07/13/22	E. Smith	0.30	307.50	B260	Attended meeting of the Board of Directors.
07/13/22	S. Alberts	1.10	1,089.00	B260	Prepare for Board call (.3), conduct Board call (.6) and follow up (.2).
07/13/22	S. Schrag	0.80	520.00	B260	Participate in call with Board and take notes.
07/13/22	T. Moyron	0.80	632.00	B260	Attended meeting of the Board of Directors re pending matters and issues.
07/14/22	S. Schrag	0.80	520.00	B260	Participate in Board call and take notes.
07/14/22	T. Moyron	0.50	395.00	B260	Analyze final KERP/KEIP (.3); prepare email to Board re same (.1); call with M. Garms re same (.2).
07/14/22	S. Alberts	0.60	594.00	B260	Board call to participate in conference with Board.
07/18/22	T. Moyron	0.80	632.00	B260	Zoom meeting with FTI, Board, FGMC, S. Alberts et al., re KERP/KEIP, MSR, Warehouse lenders, GSE and related matters.
07/18/22	S. Maizel	0.80	776.00	B260	Zoom call with Board of Directors re KERP/KEIP, budget, loans funding, etc.
07/18/22	E. Smith	0.70	717.50	B260	Attended call with FGMC Board of Directors.
07/18/22	S. Alberts	1.00	990.00	B260	Participate in call with Board.
07/18/22	S. Schrag	0.80	520.00	B260	Participate in Board call and take notes.
07/19/22	S. Schrag	0.50	325.00	B260	Participate in Board Call and take notes.
07/19/22	S. Maizel	0.40	388.00	B260	Zoom conference with Board of Directors re pending issues, including KERP/KEIP.

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Date	Timekeeper	Hours	Amount	Task	Narrative
07/19/22	T. Moyron	0.40	316.00	B260	Participate in Zoom meeting with Board, FTI, and S. Alberts, et al., re KERP/KEIP.
07/22/22	E. Smith	0.50	512.50	B260	Attended meeting of FGMC board of directors with FTI team, T. Meerovitch, and Dentons team, T. Moyron.
07/22/22	S. Maizel	0.50	485.00	B260	Zoom conference with Board, FTI, etc. re pending issues.
07/22/22	T. Moyron	0.50	395.00	B260	Participate in Board meeting re GSEs and status of case and pending issues.
07/25/22	T. Moyron	0.10	79.00	B260	Correspond with K. Verner, et al., re board call.
07/26/22	T. Moyron	0.60	474.00	B260	Participate in Zoom board meeting re updates on plan term sheet, other term sheet, upcoming hearing and related matters.
07/26/22	S. Maizel	0.60	582.00	B260	Zoom conference with Board, FTI, etc. re pending issues.
07/26/22	E. Smith	0.70	717.50	B260	Attended meeting of FGMC board of directors.
07/27/22	T. Moyron	0.70	553.00	B260	Conference call with Board members, A. Samples, and advisors regarding pending matters, including plan term sheet, Committee meeting, and other matters.
07/27/22	S. Maizel	0.70	679.00	B260	Zoom conference with FGMC Board re pending issues.
07/27/22	E. Smith	0.60	615.00	B260	Attended meeting of FGMC board of directors with T. Moyron and FTI, T. Meerovitch.
07/28/22	E. Smith	0.70	717.50	B260	Attended meeting of FGMC board of directors.
07/28/22	T. Moyron	0.70	553.00	B260	Participate in Board meeting regarding updates and other case matters, including plan term sheet.
07/28/22	S. Schrag	0.70	455.00	B260	Participate in Board call and take notes.
07/28/22	C. Montgomery	0.30	363.00	B260	Phone call with T. Macksoud regarding recusal issues for the board (.3).
07/29/22	C. Montgomery	0.50	605.00	B260	Participate in board meeting regarding Tuesday hearings (.5).

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Date	Timekeeper	Hours	Amount	Task	Narrative
07/29/22	S. Maizel	0.50	485.00	B260	Zoom conference with Board, FTI, etc. re pending issues.
07/29/22	E. Smith	0.50	512.50	B260	Attended meeting of FGMC board of directors.
07/29/22	T. Moyron	0.50	395.00	B260	Participate in Board meeting with Board, D. Oien, et al., upcoming contested hearing and related matters.
	Subtotal	42.50	36,398.50		

B300 - Claims and Plan

Date	Timekeeper	Hours	Amount	Task	Narrative
07/08/22	T. Moyron	0.40	316.00	B300	Meeting with DOJ, D. Oien, S. Maizel re claim and status of chapter 11.
07/12/22	D. Cook	0.20	124.00	B300	Discuss potential liquidating plan with T Moyron.
07/13/22	D. Cook	1.80	1,116.00	B300	Analysis as to liquidating plan precedents and requirements pertaining to same.
07/15/22	D. Cook	4.40	2,728.00	B300	Analysis as to liquidating plan precedents and requirements pertaining to same (1.6); begin drafting liquidating plan (2.8).
07/18/22	D. Cook	3.40	2,108.00	B300	Draft liquidating plan (2.8); zoom conference with Buckley regarding regulatory requirements with respect to same (.6).
07/18/22	T. Moyron	0.20	158.00	B300	Correspond with J. John, et al., regarding Synergy Technical.
07/19/22	D. Cook	5.80	3,596.00	B300	Draft liquidating plan (3.8); analysis with respect to defined terms therein (1.6); analysis with respect to potential toggle option in connection with same (.4).
07/20/22	D. Cook	6.10	3,782.00	B300	Draft liquidating plan (4.7); analysis with respect to defined terms therein (.9); analysis with respect to body of plan and mechanics of potential liquidation including with respect to trust (.5).
07/21/22	D. Cook	1.40	868.00	B300	Draft liquidating plan (.8); make revisions to same (.6).
07/24/22	E. Smith	0.30	307.50	B300	Reviewed ideas for reorg plan elements.

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07/25/22	E. Smith	0.80	820.00	B300	Attended call to review plan term sheet.
07/25/22	D. Cook	0.70	434.00	B300	Video conference with Dentons and FTI professionals regarding term sheets.
07/25/22	T. Moyron	0.90	711.00	B300	Zoom meeting with M. Schwarzmman, N. Peterman, T. Meerovich, A. Samples, et al. re plan term sheet.
07/25/22	T. Moyron	0.70	553.00	B300	Zoom meeting regarding Freddie and plan term sheets with T. Meerovich, S. Maizel, et al.
07/25/22	T. Moyron	0.40	316.00	B300	Analyze Greenberg proposed plan timeline (.2); correspond with M. Caloway re plan timeline (.2).
07/25/22	T. Moyron	0.10	79.00	B300	Call with C. Montgomery re milestones and plan timing.
07/26/22	D. Cook	0.10	62.00	B300	Email communication with PSZJ regarding plan draft.
	Subtotal	27.70	18,078.50		

B310 - Claims Administration and Objections

Date	Timekeeper	Hours	Amount	Task	Narrative
07/11/22	T. Moyron	0.40	316.00	B310	Prepare email to D. Oien re FCA (.1); analyze related issues (.3).
07/18/22	G. Miller	0.40	308.00	B310	Call with J. John re Synergy prepetition claims (.2); Respond to email re same (.2).
07/19/22	S. Schrag	0.80	520.00	B310	Review material related to Freddie Mac stipulation (.2); confer with T. Moyron regarding the same (.1); confer with Freddie Mac (W. Lyons, O. Alaniz, P. Moak, E. Hudson), FTI (T. Meerovich), and Dentons (T. Moyron) teams with FGMC (A. Samples and T. Ramm) regarding potential settlement (.5).
07/21/22	G. Miller	0.90	693.00	B310	Call with FGMC, Dentons and FTI to discuss payment of critical vendors.
07/21/22	G. Miller	0.20	154.00	B310	Follow up with T. Cairns and L. Davis Jones re final critical vendor order.
07/21/22	G. Miller	0.20	154.00	B310	Emails with J. John re Deutsche Bank prepetition claim.

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Date	Timekeeper	Hours	Amount	Task	Narrative
07/24/22	G. Miller	0.80	616.00	B310	Review draft term sheet re Freddie Mac settlement.
07/25/22	G. Miller	6.10	4,697.00	B310	Draft motion to approve Freddie Mac settlement.
07/25/22	T. Moyron	0.30	237.00	B310	Conference call with G. Miller re critical vendor motion.
07/26/22	G. Miller	0.30	231.00	B310	Call with T.Moyron re critical vendors.
07/27/22	G. Miller	0.20	154.00	B310	Emails with T. Meerovich re purchaser of Freddie Mac servicing rights.
07/28/22	G. Miller	0.70	539.00	B310	Call with P. Moak and O. Alaniz re Freddie Mac term sheet (.4); Email T.Moyron re same (.3)
07/28/22	G. Miller	0.70	539.00	B310	Review and comment on Freddie Mac Term Sheet.
07/28/22	G. Miller	0.50	385.00	B310	Call with FTI re Freddie Mac term sheet.
07/29/22	G. Miller	0.80	616.00	B310	Call with T. Moyron, C. Montgomery and W. Nolan re Freddie Mac term sheet.
07/29/22	G. Miller	2.10	1,617.00	B310	Review and revise Freddie Mac term sheet (1.9); Call with T. Moyron re same (.2).
07/29/22	G. Miller	0.20	154.00	B310	Review W. Nolan comments to Freddie Mac term sheet.
07/30/22	G. Miller	0.70	539.00	B310	Further revise Freddie Mac term sheet and circulate comments re same to P.Moak and O.Alaniz.
Subtotal		16.30	12,469.00		

B320 - Plan and Disclosure Statement (incl. Business Plan)

Date	Timekeeper	Hours	Amount	Task	Narrative
07/05/22	S. Schrag	0.20	130.00	B320	Review sample combined disclosure statement and plan (.1); confer with T. Moyron regarding the same (.1).
07/13/22	C. Montgomery	0.10	121.00	B320	Communications with T. Moyron and S. Schrag re plan timing (.1).
07/13/22	T. Moyron	0.40	316.00	B320	Analyze matters related to timing and plan (.3); call with C. Montgomery and S. Schrag re same (.1).

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Date	Timekeeper	Hours	Amount	Task	Narrative
07/22/22	S. Maizel	0.50	485.00	B320	Zoom conference with Capital Markets group, FTI, etc. re TCB/Customers issues.
07/24/22	C. Montgomery	0.20	242.00	B320	Review plan term sheet.
07/25/22	T. Moyron	0.80	632.00	B320	Correspond from and with warehouse lenders, GSEs, et al., regarding cash management and cash flow DIP orders, including K. Ziman, O. Alaniz, et al.
07/25/22	S. Maizel	0.50	485.00	B320	Review plan term sheet from Greenberg Traurig.
07/25/22	C. Montgomery	1.50	1,815.00	B320	Communications with D. Olien regarding merger history for disclosure statement (.3); review Greenburg Plan Term Sheet (.3); participate in zoom call with T. Moyron, N. Peterman, J. Naimon, M. Schwartzman, T. Meerovich and others regarding plan term sheet (.9).
07/28/22	C. Montgomery	0.60	726.00	B320	Communications with T. Moyron, L. Jones, S. Maizel regarding plan and solicitation order timing impact on Repo and Cash Flow orders (.6).
07/29/22	C. Montgomery	0.30	363.00	B320	Communications with T. Moyron regarding plan filing timing.
	Subtotal	5.10	5,315.00		

B400 - Bankruptcy-Related Advice

Date	Timekeeper	Hours	Amount	Task	Narrative
07/05/22	L. Macksoud	4.20	3,234.00	B400	Review docket and confirm entry of DIP orders (.2), review emails with working group re DIP closing and funding (.3), draft email to counsel to cash flow DIP lender re automatic perfection and DACA issue (.5), calls with various repo counterparties re close out and safe harbor issues (.6), call with working group to discuss repo safe harbor issues (.8), review bailee letters (.2) and draft email to company and FTI re instruction on same (.4), call with Dentons group, local counsel and FTI to discuss open items and next steps (1.2).

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Date	Timekeeper	Hours	Amount	Task	Narrative
07/19/22	L. Macksoud	7.60	5,852.00	B400	Draft email to counter parties re draft final cash management order (.4), call with counsel to TCB bank re cash management issues (.5), open items call with Dentons and FTI teams (1.0), review and revise draft final cash flow DIP order (1.7), call with counsel to DIP lender to discuss same (.5), internal call to discuss issue re Customer's fees (.5), call and emails with debtor to discuss certain payments received and requests for return thereof (.8), call with A. Helman to discuss certain account issues and confer with M. Jacobs of company re same (.4), call with T. Moyron re update on Freddie Mac issue (.2), call with Dentons, FTI and debtors to discuss Fannie LLPA and TCB deposit (1.0), review additional revisions to Cash Flow DIP Order and draft email to all warehouse lenders re proposed final order (.6)

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Date	Timekeeper	Hours	Amount	Task	Narrative
07/26/22	L. Macksoud	10.40	8,008.00	B400	Call with C. Montgomery and T. Moyron to discuss Ginnie language and 506(c) waiver, follow up call with company to discuss same (.5), calls and emails with C. O'Leary and C. Montgomery re same (.3), and draft summary overview for company re same (.4), Call with E. Howe re GNMA language (.3), draft an revise proposed Ginnie language per comments from Ginnie and cash flow dip lender (.6), confer with counsel to Ginnie on revised language (.4), call with counsel to Fannie re missing accounts and most favored nation language (.4), call with L. Smith to discuss same (.3), call with C. Montgomery to discuss comments to repo dip order (.2), call with FTI to discuss JSACAs, exhibits to cash management order and necessary revisions thereto (.6), emails with client to discuss same (.3), draft and further review cash management order per additional comments from GSEs and warehouse lenders (2.2), review additional comments from Flagstar on cash flow dip order (.3), and confer with dip lender re proposed edits per same (.7), call with Dentons and FTI working groups to discuss open issues and prepare for committee presentation (2.1), confer with counsel to committee re reservation of rights issue (.3), confer with counsel to Rushmore and company re servicing issues(.4), confer with counsel to Planet Home re cash management order (.1).

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Date	Timekeeper	Hours	Amount	Task	Narrative
07/29/22	L. Macksoud	6.50	5,005.00	B400	Call with T. Meerovich and working group to prepare for second day hearing and testimony to be provided at same (2.0), review and revise draft Meerovich declaration (1.7), call with counsel to Customers and Flagstar to discuss 559 Motion, DIP Motion and waiver issue (.5), calls and emails with client regarding same (.8), confer with DIP lender counsel re DIP milestone extension (.2), review proposed revisions to 559 order and confer with Customers counsel re same (.5), call with T. Moyron to discuss case status and next steps (.5), confer with D. Cook re draft declaration and draft DIP reply (.3).
07/30/22	L. Macksoud	4.20	3,234.00	B400	Participate in hearing and witness prep call with Dentons and FTI working groups (3.5), prepare hearing notes on cash management order in anticipation of Tuesday's hearing (.7).
	Subtotal	32.90	25,333.00		

B410 - General Bankruptcy Advice/Opinions

Date	Timekeeper	Hours	Amount	Task	Narrative
07/11/22	S. Schrag	0.50	325.00	B410	Call with J. John, D. Oien, MA Kaptain, J. Krasne, T. Moyron regarding outstanding issues, including litigation notices, initial debtor interview with US Trustee, Rushmore followup re pipeline and servicing.
	Subtotal	0.50	325.00		

EMP - Employee matters

Date	Timekeeper	Hours	Amount	Task	Narrative
06/30/22	S. McCandless	0.70	689.50	EMP	Initial review of WARN lawsuit filed in bankruptcy court.
07/05/22	T. Moyron	0.20	158.00	EMP	Correspond with S. McCandless re WARN Complaint.
07/05/22	S. McCandless	0.80	788.00	EMP	Further review and analyze WARN class action complaint filed in Bankruptcy Court (lead plaintiff Buckley) for defenses.

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Date	Timekeeper	Hours	Amount	Task	Narrative
07/05/22	S. McCandless	0.30	295.50	EMP	Communicate with S. Alberts regarding strategy for response to Buckley WARN class action complaint.
07/05/22	S. McCandless	0.80	788.00	EMP	Assess potential class membership of five named plaintiffs in Buckley WARN class action by reviewing client's detailed information for reporting arrangements to Plano or FGMC's other locations.
07/06/22	T. Moyron	0.50	395.00	EMP	Analyze matters related to KERP/KEIP and analyze related correspondence from C. Doherty, et al.
07/06/22	T. Moyron	0.50	395.00	EMP	Zoom meeting with S. Alberts, et al., regarding WARN.
07/06/22	T. Moyron	0.30	237.00	EMP	Conference call with S. Schrag regarding pending issues and case matters.
07/06/22	S. Maizel	0.30	291.00	EMP	Review and respond to emails re employee issues.
07/06/22	S. McCandless	1.30	1,280.50	EMP	Prepare questions and background information for conference call to discuss WARN planning, strategy, handling, and information needed (.80); conference call with T. Moyron, S. Maizel, S. Alberts, and C. Doherty to discuss same (.50).
07/06/22	S. McCandless	0.70	689.50	EMP	Review and analyze employment complaint brought by three plaintiffs (ED Texas discrimination Complaint).
07/06/22	S. McCandless	0.50	492.50	EMP	Further consider and communicate with Dentons team regarding releases of employment claims, including WARN claims, and legal considerations applicable to same.
07/07/22	T. Moyron	0.40	316.00	EMP	Analyze employment application (.3); exchange emails with M. Yoshimura re Dentons employment application (.1).
07/07/22	T. Moyron	0.10	79.00	EMP	Conference call with T. Cairns re FTI employment application.
07/07/22	T. Moyron	0.30	237.00	EMP	Analyze issues related to WARN and KERP/KEIP.
07/07/22	T. Moyron	1.00	790.00	EMP	Team meetings regarding KERP/KEIP with Company, FTI and Dentons.

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07/07/22	S. McCandless	2.30	2,265.50	EMP	Consider and prepare first draft of WARN notice for next phase (1.60); review previous WARN notice for same (.40); forward to S. Alberts, C. Doherty, and N. Hutson with comments on same (.30).
07/07/22	S. McCandless	0.60	591.00	EMP	Communicate with S. Alberts regarding revisions to first draft of upcoming WARN notice (.40); revise same (.20).
07/07/22	S. McCandless	0.50	492.50	EMP	Forward first draft of WARN notice for next phase to D. Oien and Dentons team with comments on timing and recipients of same.
07/07/22	S. McCandless	0.20	197.00	EMP	Communicate with S. Alberts regarding request for draft of WARN letter in anticipation of further layoffs.
07/07/22	S. Maizel	0.50	485.00	EMP	Telephone conference with Dentons Team, FTI, etc., re creation of KERP/KEIP.
07/08/22	S. McCandless	0.70	689.50	EMP	Discuss and analyze WARN notice requirements for next phase of layoffs with N. Hutson (.30); related review of WARN regulations (.40).
07/11/22	S. McCandless	0.20	197.00	EMP	Communicate with D. Oien, Dentons team, and M. Calloway regarding WARN notice for additional employees and re-send draft of same.
07/11/22	S. McCandless	2.00	1,970.00	EMP	Research WARN Act authority for potential reduction of WARN Act damages by earlier severance payments made (1.30); provide detailed information on same to Dentons team and M. Calloway (.40); review prior related information from bankruptcy team for same (.30).
07/11/22	T. Moyron	0.30	237.00	EMP	Analyze WARN research.
07/11/22	T. Moyron	0.50	395.00	EMP	Conference calls with M. Hyland regarding KERP/KEIP (.2), (.3).
07/12/22	T. Moyron	1.50	1,185.00	EMP	Analyze KERP/KEIP plan and timing and other labor matters and conference call with FTI and A. Samples re same.
07/12/22	T. Moyron	0.80	632.00	EMP	Analyze matters related to KERP/KEIP.

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Date	Timekeeper	Hours	Amount	Task	Narrative
07/13/22	S. McCandless	0.30	295.50	EMP	Communicate to Dentons team regarding WARN requirements for employees to be laid off and timing of same.
07/13/22	S. McCandless	1.70	1,674.50	EMP	Draft and revise WARN notice for additional employees to be laid off based on information known to date.
07/13/22	S. McCandless	0.80	788.00	EMP	Further revise and create new draft of WARN notice for upcoming layoffs incorporating comments received.
07/13/22	T. Moyron	0.20	158.00	EMP	Communications with C. Montgomery, S. Alberts and S. McCandless regarding KERP/KEIP and WARN notices.
07/13/22	T. Moyron	0.30	237.00	EMP	Correspond with M. Schwarzmann re KERP/KEIP.
07/13/22	T. Moyron	0.30	237.00	EMP	Correspond with M. Hyland, et al., re KERP/KEIP.
07/13/22	T. Moyron	1.20	948.00	EMP	Analyze matters related to WARN, KEIP, and KEIP and correspond re same with S. McCandless, R. Chesley, et al.
07/13/22	T. Moyron	0.30	237.00	EMP	Attention to motion to approve KEIP/KERP.
07/13/22	S. McCandless	0.80	788.00	EMP	Communicate with T. Moyron regarding WARN requirements for upcoming layoffs.
07/14/22	S. McCandless	2.80	2,758.00	EMP	Discuss WARN notice to additional employees to be laid off with C. Vacante (.60); further revise and forward WARN notice per latest comments (.70); conference call with D. Oien and C. Vacante to discuss and further revise WARN notice (.90); forward draft to T. Moyron with comments on same (.20); review slightly revised version received from D. Oien after her discussion with T. Moyron (.20); further related communication with T. Moyron and D. Oien (.20).

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07/14/22	S. McCandless	1.60	1,576.00	EMP	Conference call with clients, Dentons team, and FTI to continue discussion of WARN and KERP/KEIP but primarily to discuss WARN applicability to upcoming layoffs (.50); prepare outline of various current considerations to prepare for conference call (.80); forward same to S. Alberts with comments on same (.30).
07/14/22	S. McCandless	0.80	788.00	EMP	Review and analyze D. Oien's initial edits to WARN notice to additional employees to be laid off (.60); communicate with S. Alberts regarding recommended edits (.20).
07/14/22	T. Moyron	0.50	395.00	EMP	Continued analysis of KERP, KEIP, and WARN issues.
07/14/22	T. Moyron	0.50	395.00	EMP	Follow up WARN discussion with FTI, M. Caloway, S. Alberts et al. re finalization of plan.
07/14/22	T. Moyron	3.40	2,686.00	EMP	Teams meeting with Company, FTI, and Dentons re labor issues (1.0); call with FTI, S. Alberts, et al. and follow up call with FTI re final KERP/KEIP (.9); analyze updated KERP/KEIP (.4); analyze FTI, et al., emails re KERP/KEIP (.4); analyze issues related to KERP/KEIP, timeline, and procedural issues (.7).
07/14/22	T. Moyron	0.80	632.00	EMP	Zoom meeting with Board regarding KERP/KEIP and status of other matters in the case.
07/15/22	T. Moyron	2.70	2,133.00	EMP	Analyze updated KERP/KEIP and open points in motion and declarations (.8); correspond with C. Doherty, et al. re open points (.4); meeting with S. Alberts, W. Noland, et al. re preparation for upcoming meeting with DIP lender re KERP/KEIP (.5); conference call with S. Alberts, W. Nolan, Greenberg, PIMCO, et al. (1.0).
07/15/22	T. Moyron	0.20	158.00	EMP	Analyze proposed language to employees (.1) and prepare email to S. Alberts re same (.1).
07/15/22	S. McCandless	0.20	197.00	EMP	Review communication from C. Doherty regarding timing of anticipated RIF's (.10); communicate with Dentons team regarding same (.10).

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07/15/22	S. McCandless	0.20	197.00	EMP	Communicate with C. Vacante regarding change in timing for sending of WARN notices.
07/15/22	S. McCandless	0.30	295.50	EMP	Review communication from D. Oien regarding change in timing of delivery of WARN notices (.10); communicate with T. Moyron regarding same (.20).
07/17/22	S. McCandless	1.10	1,083.50	EMP	Conference call with T. Moyron, S. Alberts, FTI, and clients regarding information to be provided to employees and KERP/KEIP matters in context of WARN notices.
07/17/22	S. McCandless	0.40	394.00	EMP	Further conference call with A. Samples, R. Chesley, and T. Moyron regarding employee communications and further revise talking points (.30); call with T. Moyron in preparation for same (.10).
07/17/22	S. McCandless	0.30	295.50	EMP	Forward current version of WARN notice to clients and Dentons team with comments regarding August and September layoffs (.30).
07/17/22	S. McCandless	0.60	591.00	EMP	Prepare September WARN notice (.40); forward to clients and Dentons team with comments on same (.20).
07/17/22	S. McCandless	0.90	886.50	EMP	Initial review of proposed responses to Dallas Evening News (.40); respond to T. Moyron's request for comments regarding same (.30); further related communications (.20).
07/17/22	S. McCandless	0.40	394.00	EMP	Communicate with S. Alberts and T. Moyron regarding WARN implications for August and September layoffs.
07/17/22	T. Moyron	1.10	869.00	EMP	Conference call with FTI, A. Samples, D. Oien, S. Alberts, et al. regarding communications to employees, KERP/KEIP, and other labor matters.
07/17/22	T. Moyron	0.80	632.00	EMP	Zoom meeting with DIP lender, N. Peterman, FTI, and S. Alberts re KERP/KEIP (.5); conference call with A. Samples regarding same and communications with employees (.3).

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07/17/22	T. Moyron	0.40	316.00	EMP	Conference call with S. McCandless re labor matters (.1); follow up call with R. Chesley, A. Samples, and S. McCandless re employee communications (.3).
07/17/22	T. Moyron	0.80	632.00	EMP	Analyze and prepare comments to KERP/KEIP.
07/17/22	T. Moyron	1.10	869.00	EMP	Zoom meeting with L. Jones, M. Caloway, C. Doherty, and FTI re KERP/KEIP motion, declaration, and related matters and status.
07/18/22	T. Moyron	0.30	237.00	EMP	Correspond with T. Becker regarding responses to press inquiries (.1); respond with S. Alberts and S. McCandless re same (.2).
07/18/22	T. Moyron	0.40	316.00	EMP	Analyze motion to shorten time and prepare comments to motion (.3); prepare email to M. Caloway re same (.1).
07/18/22	T. Moyron	1.30	1,027.00	EMP	Zoom meeting with FTI, S. Alberts, et al re KERP/KEIP motion, decorations and documents and related inquires.
07/18/22	T. Moyron	0.30	237.00	EMP	Zoom meeting with M. Schwarzmman, N. Peterman, and W. Nolan re KERP/KEIP.
07/18/22	T. Moyron	0.70	553.00	EMP	Analyze proposed changes to KERP/KEIP motion and declaration (.3); correspond with M. Caloway, et al., re same (.2); and correspond with A. Samples regarding narrative related to employees required for postpetition activities (.2).
07/18/22	S. Maizel	0.60	582.00	EMP	Zoom call with FTI, etc. re KERP/KEIP issues.
07/18/22	S. Maizel	3.00	2,910.00	EMP	Zoom call with S. Alberts, FTI, etc. re KERP/KEIP issues (1.5); review and revise KERP/KEIP motion (1.5).
07/18/22	T. Moyron	0.90	711.00	EMP	Analyze notices to government re WARN (.2) and related issues related to WARN (.4); correspond with S. McCandless, et al., re same (.3).
07/18/22	T. Moyron	1.70	1,343.00	EMP	Analyze updates to KERP/KEIP motion and related documents (1.2); correspond with S. Alberts, et al., re same (.5).

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Date	Timekeeper	Hours	Amount	Task	Narrative
07/18/22	S. McCandless	0.80	788.00	EMP	Review and analyze proposed language for Dallas Morning News (.30); provide comments on same to S. Alberts and T. Moyron (.20); further related communications regarding necessary revisions with S. Alberts (.20); finalize same with T. Becker of FTI and S. Alberts (.10).
07/18/22	S. McCandless	0.20	197.00	EMP	Communicate with C. Vacante regarding governmental WARN notices.
07/18/22	S. McCandless	2.10	2,068.50	EMP	Telephone call to N. Hutson with instructions regarding preparation for governmental WARN notices and related current background to August and September notices (.30); review and analyze first draft of said notices (.60); begin revisions to same (.30); telephone call with N. Hutson regarding further revisions (.40); review new drafts of same (.30); further revise same (four notices for August and September layoffs for Plano and State of Texas (.90); finalize same with N. Hutson (.30).
07/18/22	S. McCandless	1.00	985.00	EMP	Further revise employee WARN notices for August and September layoffs (.80); communicate with C. Vacante regarding same (.20).
07/18/22	S. McCandless	0.40	394.00	EMP	Communicate with and telephone call with C. Vacante regarding governmental WARN notices (.40).
07/18/22	S. McCandless	2.30	2,265.50	EMP	Review and analyze S. Albert's proposed changes to governmental WARN notices (.30); respond regarding same (.20); further related communications with T. Moyron and S. Alberts (.20); review N. Hutson's further revised versions prepared in response to same (.30); make final changes to four governmental WARN notices with C. Vacante (.40); communicate with N. Hutson regarding mailing matters (.20); report to Dentons team and clients regarding status of same (.20); discuss handling of same with M. Kaptain (.20); review final versions received from C. Vacante (.30).

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Date	Timekeeper	Hours	Amount	Task	Narrative
07/18/22	S. McCandless	0.30	295.50	EMP	Review communication from C. Vacante regarding questions from employees not notified of layoff (.20); communicate with S. Alberts regarding same (.10).
07/19/22	S. McCandless	0.70	689.50	EMP	Review communication from C. Vacante regarding questions from employees not impacted by pending layoffs (.20); communicate with S. Alberts regarding same (.10); review write up from S. Alberts for response to same (.30); further communicate with S. Alberts regarding edit to same (.10).
07/19/22	T. Moyron	0.40	316.00	EMP	Call with C. Doherty regarding open items on KERP/KEIP and circulation of updated motion (.2); call with L. D. Jones re KERP/KEIP and open items (.2).
07/19/22	T. Moyron	3.30	2,607.00	EMP	Further correspondence with M. Proctor, et al., re comments on KERP/KEIP motion, declaration, and exhibits and related issues (1.3); call with S. Alberts regarding same and prior to Board call (.2); analyze motion , declaration and exhibits and prepare comments to same (1.2); analyze related matters (.6).
07/19/22	T. Moyron	0.40	316.00	EMP	Analyze comments from T. Meerovich to motion and declaration (.2); prepare emails to T. Meerovich, et al., re same (.2).
07/19/22	T. Moyron	0.20	158.00	EMP	Conference call with A. Samples KERP/KEIP and matter related to PTO (.1); call with T. Meerovich and W. Nolan re same (.1).
07/19/22	S. Maizel	1.00	970.00	EMP	Revising KERP/KEIP motion.
07/19/22	S. McCandless	0.20	197.00	EMP	Communicate with C. Vacante regarding confirmation of mailing of notices.
07/20/22	T. Moyron	0.40	316.00	EMP	Correspond with S. McCandless, et al., re employee matters.

First Guaranty Mortgage Corporation  
Matter: 15810756-000003  
Invoice No.: 2553500

August 31, 2022

Date	Timekeeper	Hours	Amount	Task	Narrative
07/20/22	T. Moyron	1.50	1,185.00	EMP	Correspond with Committee counsel regarding request for unredacted version of KERP/KEIP filings (.2); confer with S. Alberts, et al., regarding request from Committee counsel, UST objection, and related matters (.6); correspond with M. Caloway regarding redacted versions of pleadings and PEO basis (.3); call with S. Maizel re same (.1); analyze UST objection (.2); analyze Court's order (.1).
07/21/22	T. Moyron	0.90	711.00	EMP	Attend conference call with S. McCandless, S. Alberts, R. Heidenreich, and C. Doherty to discuss strategy for and handling of defense of WARN Act lawsuits.
07/21/22	T. Moyron	0.30	237.00	EMP	Communicate with S. McCandless and S. Alberts regarding service of WARN class action complaint in Buckley case filed in Delaware Bankruptcy Court. (.2); communications with counsel for Buckley (.1).
07/21/22	S. Maizel	0.30	291.00	EMP	Telephone conference with T. Moyron re issues related to KERP/KEIP.
07/25/22	J. Peterson	0.90	472.50	EMP	(Employment Matter) Discussions with S. McCandless regarding the WARN Act Answer for the bankruptcy
07/26/22	T. Moyron	0.30	237.00	EMP	Conference call with L. Jones regarding KERP/KEIP.
07/26/22	T. Moyron	0.40	316.00	EMP	Analyze matters related to KERP/KEIP and questions raised with respect to plans.
07/26/22	S. Maizel	0.50	485.00	EMP	Telephone conference with S. Alberts and T. Moyron re KERP/KEIP issues.
07/26/22	T. Moyron	0.60	474.00	EMP	Teams meeting with D. Oien, A. Samples, W. Nolan, S. Alberts, et al. re labor questions related to KERP/KEIP.
07/26/22	T. Moyron	0.50	395.00	EMP	Call with L. Jones, S. Alberts, et al. re labor matters.
07/27/22	T. Moyron	0.30	237.00	EMP	Call with L. Jones and S. Maizel regarding KERP/KEIP.
07/27/22	T. Moyron	0.50	395.00	EMP	Call with M. Schwarzman, N. Peterson, S. Maizel, et al., regarding KERP/KEIP matter.

First Guaranty Mortgage Corporation  
Matter: 15810756-000003  
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August 31, 2022

Date	Timekeeper	Hours	Amount	Task	Narrative
07/27/22	T. Moyron	0.40	316.00	EMP	Call with A. Samples, S. Maizel, T. Meerovich and D. Owen re labor issue.
07/27/22	T. Moyron	0.50	395.00	EMP	Conference call with S. Alberts and S. Maizel re KERP/KEIP (.3) and prepare email to L. Jones, et al., re same (.1) and analyze responses from L. Jones et al. (.1).
07/27/22	S. McCandless	0.60	591.00	EMP	Communicate with S. Alberts regarding characterization of employee's termination and implications of same (.30); discuss same with S. Alberts and L. Davis Jones (.20); review S. Alberts' follow up with A. Samples and D. Oien (.10).
07/27/22	S. Maizel	0.60	582.00	EMP	Zoom conference with L.D. Jones, etc. re KERP/KEIP issues (.3); telephone conference with D. Galfus, BRG, re same (.3).
07/27/22	S. Maizel	1.10	1,067.00	EMP	EMP zoom conference with M. Schwarzmann, FTI, A. Samples, etc. re labor issues (.5); zoom conference with A. Samples, FTI, etc. re same (.4); telephone conference with S. Alberts, T. Moyron re same (.2).
07/27/22	T. Moyron	1.30	1,027.00	EMP	Analyze various employment matters including priority payments and other labor matters (.7): analyze email from M. Kaptain re priority payment matters (.1) and call with M. Kaptain regarding same (.3); prepare email to L. Jones, et al., re KERP/KEIP (.1) and analyze response emails (.1).
07/28/22	T. Moyron	0.60	474.00	EMP	Correspond with M. Hyland, et al., re KERP/KEIP documents for Committee advisors (.2); analyze S. Alberts, et al., emails re employee cap and related matters (.2); discussion with S. Alberts re KERP/KEIP (.2).
07/28/22	T. Moyron	0.90	711.00	EMP	Conference call with T. Meerovich, L. Jones, S. Alberts, et al. re preparation for KERP/KEIP and DIP dispute re final hearing.

First Guaranty Mortgage Corporation  
Matter: 15810756-000003  
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August 31, 2022

Date	Timekeeper	Hours	Amount	Task	Narrative
07/28/22	T. Moyron	1.30	1,027.00	EMP	Analyze emails from M. Kaptain, et al. regarding labor matters (.4); analyze issues related to priority cap (.3); calls with D. Oien (.1), A. Samples (.1), M. Hyland (.1x2), L. Jones (.2).
07/28/22	S. Maizel	0.30	291.00	EMP	Telephone conference with T. Moyron re KERP/KEIP issues.
07/28/22	S. McCandless	0.80	788.00	EMP	Review and analyze detailed email from D. Oien regarding KERP and KEIP matters, particularly as related to Tiers; respond to T. Moyron and S. Alberts regarding same, including timing of retention payments and releases.
07/29/22	S. Maizel	1.00	970.00	EMP	Telephone conference with G. Miller re employment issues related to insiders (.2); research re definition of officer as insider in 3rd Circuit and Delaware (.8).
07/29/22	S. Maizel	0.50	485.00	EMP	Zoom conference with M. Kaptain, etc., FTI, re wage issues.
07/29/22	S. McCandless	1.70	1,674.50	EMP	Review and analyze Motion for Approval of Key Employee Retention Plan for potential impact on WARN notifications and employee releases of claims.
07/29/22	S. McCandless	0.80	788.00	EMP	Research and analyze requirements for updated WARN notification to employees whose original layoff dates are extended.
07/29/22	S. McCandless	0.20	197.00	EMP	Review communications of M. Litvak, S. Alberts, and D. Oien regarding Tier movement from one tier to the other for KERP motion as related to impact on pending employment matters.
07/31/22	S. Maizel	0.80	776.00	EMP	Telephone conference (x2) with McKay Jacobsen, FTI, re payments to insiders under the wage motion and related issues (.2); review and respond to emails re requests for information from UCC re Employee Wage Motion (.4); telephone conference with T. Moyron re same (.1); telephone conference with M. Kaptain, FTI, re same (.1).
07/31/22	S. Maizel	0.90	873.00	EMP	Review Employee Wage Motion (.6); review UCC objection to Employee Wage Motion (.3).

First Guaranty Mortgage Corporation  
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August 31, 2022

Date	Timekeeper	Hours	Amount	Task	Narrative
	Subtotal	90.80	80,741.00		

INS - Insurance

Date	Timekeeper	Hours	Amount	Task	Narrative
07/25/22	T. Moyron	0.20	158.00	INS	Correspond with G. Miller, et al., re insurance order.
	Subtotal	0.20	158.00		

WARNACT- WARN Act Issues

Date	Timekeeper	Hours	Amount	Task	Narrative
07/21/22	D. Marrocco	1.00	1,020.00	WARNA	Prepare for and participate in conference call with S. Alberts and T. Moyron on WARN ACT case.
07/24/22	D. Marrocco	1.50	1,530.00	WARNA	Review federal district court complaints and bankruptcy complaint (1.0); review First Day Declaration (0.50).
07/25/22	D. Marrocco	0.50	510.00	WARNA	Review class cert materials; review case law on WARN ACT First Day Declaration.
07/29/22	D. Marrocco	0.80	816.00	WARNA	Prepare for and participate in strategy call with Dentons.
	Subtotal	3.80	3,876.00		

First Guaranty Mortgage Corporation  
Matter: 15810756-000003  
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August 31, 2022

SUMMARY OF AMOUNT DUE BY TASK CODE

Task Code	Task Code Name	Fees
B110	Case Administration	258,332.50
B120	Asset Analysis and Recovery	6,456.00
B130	Asset Disposition	204,055.00
B140	Relief from Stay/Adequate Protection Proceedings	24,315.50
B150	Meetings of and Communications with Creditors	25,482.50
B160	Fee/Employment Applications	19,855.00
B185	Assumption/Rejection of Leases and Contracts	32,184.00
B190	Other Contested Matters (excl. assumption/rejection motions)	35,603.00
B200	Operations	1,537.50
B210	Business Operations	29,216.50
B220	Employee Benefits/Pension	163,581.50
B230	Financing/Cash Collections	598,035.00
B260	Board of Directors Matters	36,398.50
B300	Claims and Plan	18,078.50
B310	Claims Administration and Objections	12,469.00
B320	Plan and Disclosure Statement (incl. Business Plan)	5,315.00
B400	Bankruptcy-Related Advice	25,333.00
B410	General Bankruptcy Advice/Opinions	325.00
EMP	Employee matters	80,741.00
INS	Insurance	158.00
WARNACT	WARN Act Issues	3,876.00
	Total This Matter	\$1,581,348.00

First Guaranty Mortgage Corporation  
Matter: 15810756-000003  
Invoice No.: 2553500

August 31, 2022

TIME AND FEE SUMMARY

<u>Timekeeper</u>	<u>Rate</u>	<u>Hours</u>	<u>Fees</u>
C. Montgomery	\$1,210.00	171.00	\$206,910.00
R. Heidenreich	\$930.00	5.70	\$5,301.00
S. Alberts	\$990.00	102.40	\$101,376.00
S. Maizel	\$970.00	117.00	\$113,490.00
T. Moyron	\$790.00	314.80	\$248,692.00
C. O'Leary	\$850.00	150.30	\$127,755.00
D. Marrocco	\$1,020.00	3.80	\$3,876.00
E. Smith	\$1,025.00	158.30	\$162,257.50
G. Miller	\$770.00	45.10	\$34,727.00
J. Murphy	\$1,045.00	24.10	\$25,184.50
L. Harrison	\$1,140.00	98.60	\$112,404.00
L. Macksoud	\$770.00	144.20	\$111,034.00
N. Mersky	\$895.00	1.30	\$1,163.50
P. O'Connell	\$1,105.00	0.30	\$331.50
R. Richards	\$940.00	4.40	\$4,136.00
S. McCandless	\$985.00	64.80	\$63,828.00
M. Zeefe	\$690.00	7.10	\$4,899.00
A. Pendexter	\$680.00	1.00	\$680.00
C. Doherty, Jr.	\$695.00	87.90	\$61,090.50
D. Cook	\$620.00	151.90	\$94,178.00
J. Nelson	\$680.00	6.20	\$4,216.00
S. Schrag	\$650.00	120.70	\$78,455.00
J. Peterson	\$525.00	0.90	\$472.50
E. Cobarrubias	\$350.00	0.50	\$175.00
T. Fowler	\$265.00	0.40	\$106.00
G. Medina	\$360.00	23.60	\$8,496.00
J. Milko	\$320.00	0.30	\$96.00
K.M. Howard	\$340.00	<u>17.70</u>	<u>\$6,018.00</u>
Totals		1,824.30	\$1,581,348.00

First Guaranty Mortgage Corporation  
Matter: 15810756-000003  
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August 31, 2022

DISBURSEMENT DETAIL

<u>Date</u>	<u>Description</u>	<u>Amount</u>
7/13/2022	Delivery & Postage FedEx Airbill #275496477194 07/13/22 Delivery to 268 BROOKSIDE RD, DARIEN, CT	29.92
7/29/2022	Delivery & Postage ACE ATTORNEY 469698 DEL PRIORITY TO SAM MAIZEL 2	60.78
7/29/2022	Delivery & Postage ACE ATTORNEY 469698 DEL PRIORITY TO TANIA MOYRON	26.68
	SUBTOTAL	117.38
7/18/2022	Filing Filing fees	4.25
7/16/2022	Filing Sarah M. Schrag, Filing fee	31.35
	SUBTOTAL	35.60
7/6/2022	Lexis COOK\ DAVID	146.00
7/12/2022	Lexis FOWLER\ TIM	307.76
	SUBTOTAL	453.76
7/6/2022	WESTLAW COOK\DAVID F	2,106.09
7/7/2022	WESTLAW COOK\DAVID F	150.00
7/12/2022	WESTLAW COOK\DAVID F	75.00
7/25/2022	WESTLAW COOK\ DAVID F	225.00
7/29/2022	WESTLAW COOK\ DAVID F	528.15
7/31/2022	WESTLAW COOK\ DAVID F	225.00
	SUBTOTAL	3,309.24
	Total Disbursements	\$3,915.98
	Total This Matter	\$1,585,263.98

First Guaranty Mortgage Corporation August 31, 2022  
Invoice #: 2553500

TOTALS

Total Hours	1,824.30
Fee Total, all Matters	\$ 1,581,348.00
Disbursement Total	\$ 3,915.98
Invoice Total	<u>\$ 1,585,263.98</u>

**Dentons US LLP Second Monthly Fee Application**

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re:

FIRST GUARANTY MORTGAGE  
CORPORATION, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-10584 (CTG)

(Jointly Administered)

Objection Deadline: December 14, 2022, at 4:00  
p.m. (prevailing Eastern Time)

**SUMMARY OF SECOND MONTHLY FEE APPLICATION OF  
DENTONS US LLP AS COUNSEL FOR THE DEBTORS AND  
DEBTORS IN POSSESSION, FOR ALLOWANCE  
OF COMPENSATION AND REIMBURSEMENT OF EXPENSES  
FOR THE PERIOD FROM AUGUST 1, 2022 THROUGH AUGUST 31, 2022**

General Information	
Name of Applicant:	Dentons US LLP
Authorized to Provide Services to:	Debtors and Debtors in Possession
Date of Retention:	Effective to June 30, 2022, by order signed on August 2, 2022
Period for Which Compensation and Expense Reimbursement is Sought:	August 1, 2022, through August 31, 2022
Amount of Compensation Sought as Actual, Reasonable, and Necessary:	\$1,155,705.00
Amount of payment sought:	\$924,564.00
Amount of Expense Reimbursement Sought As Actual, Reasonable, and Necessary:	\$28,242.41

This is a ✓ monthly \_\_\_\_\_ interim \_\_\_\_ final application.

This is Dentons's second monthly fee application.

<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's tax identification number, are: First Guaranty Mortgage Corporation (9575); and Maverick II Holdings, LLC (5621). The location of the corporate headquarters and the service address for First Guaranty Mortgage Corporation is 5800 Tennyson Parkway, Suite 450, Plano, TX 75024.



**Prior Fee Applications Filed**

Date Filed	Period Covered	Requested Fees	Requested Expenses	Approved Fees	Approved Expenses
10/17/2022	June 30, 2022 - July 31, 2022	1,581,348.00	\$3,915.98	\$1,264,078.40	\$3,915.98

**DUS PROFESSIONALS**

Name of Professional Individual	Position of the Applicant, Year of Obtaining License to Practice, Year of Joining the Firm	Department	Hourly Billing Rate	Total Interim Hours Billed	Total Interim Compensation
Salvatore O. Franco	Partner - Admitted to the Bar in 1996; Joined the Firm in 1997	Capital Markets	\$1,340	5.50	\$7,370.00
Claude D. Montgomery	Partner - Admitted to the Bar in 1984; Joined the Firm in 2002	Restructuring Insolvency & Bankruptcy	\$1,210	133.10	\$161,051.00
Lynn P. Harrison, III	Partner - Admitted to the Bar in 1984; Joined the Firm in 2020	Restructuring Insolvency & Bankruptcy	\$1,140	129.60	\$147,744.00
Jeffrey J. Murphy	Partner - Admitted to the Bar in 1984; Joined the Firm in 1985	Capital Markets	\$1,045	17.30	\$18,078.50
E. Lee Smith	Partner - Admitted to the Bar in 1986; Joined the Firm in 2003	Capital Markets	\$1,025	78.80	\$80,770.00
Sam J. Alberts	Partner - Admitted to the Bar in 1993; Joined the Firm in 2011	Restructuring Insolvency & Bankruptcy	\$990	16.40	\$16,236.00
Sandra McCandless	Partner - Admitted to the Bar in 1973; Joined the Firm in 1994	Employment & Labor	\$985	54.80	\$53,978.00
Samuel R. Maizel	Partner - Admitted to the Bar in 1985; Joined the Firm in 2015	Restructuring Insolvency & Bankruptcy	\$970	150.90	\$146,373.00
Robert E. Richards	Partner - Admitted to the Bar in 1988; Joined the Firm in 1988	Restructuring Insolvency & Bankruptcy	\$940	0.10	\$94.00
Roger K. Heidenreich	Partner - Admitted to the Bar in 1983; Joined the Firm in 1983	Commercial Litigation	\$930	0.80	\$744.00
Christopher D. O'Leary	Partner - Admitted to the Bar in 2009; Joined the Firm in 2014	Capital Markets	\$850	102.70	\$87,295.00
Tania M. Moyron	Partner - Admitted to the Bar in 2005; Joined the Firm in 2017	Restructuring Insolvency & Bankruptcy	\$790	256.10	\$202,319.00
Geoffrey M. Miller	Partner - Admitted to the Bar in 2012; Joined the Firm in 2014	Restructuring Insolvency & Bankruptcy	\$770	93.90	\$72,303.00

<b>Name of Professional Individual</b>	<b>Position of the Applicant, Year of Obtaining License to Practice, Year of Joining the Firm</b>	<b>Department</b>	<b>Hourly Billing Rate</b>	<b>Total Interim Hours Billed</b>	<b>Total Interim Compensation</b>
Lauren M. Macksoud	Partner - Admitted to the Bar in 2003; Joined the Firm in 2017	Restructuring Insolvency & Bankruptcy	\$770	74.40	\$57,288.00
Hudson J. Overcash	Senior Managing Associate - Admitted to the Bar in 2014; Joined the Firm in 2021	Capital Markets	\$740	5.00	\$3,700.00
Casey W. Doherty, Jr.	Senior Managing Associate - Admitted to the Bar in 2011; Joined the Firm in 2021	Restructuring Insolvency & Bankruptcy	\$695	17.50	\$12,162.50
Jeffrey C. Nelson	Managing Associate - Admitted to the Bar in 2017; Joined the Firm in 2017	Capital Markets	\$680	0.90	\$612.00
Sarah M. Schrag	Managing Associate - Admitted to the Bar in 2016; Joined the Firm in 2016	Restructuring Insolvency & Bankruptcy	\$650	59.50	\$38,675.00
David F. Cook	Managing Associate - Admitted to the Bar in 2017; Joined the Firm in 2019	Restructuring Insolvency & Bankruptcy	\$620	37.90	\$23,498.00
Demadeep Kaur	Associate - Admitted to the Bar in 2020; Joined the Firm in 2019	Capital Markets	\$570	11.50	\$6,555.00
Jessica Peterson	Associate - Admitted to the Bar in 2019; Joined the Firm in 2022	Employment & Labor	\$525	19.50	\$10,237.50
Nicole L. Hutson	Senior Managing Associate - Admitted to the Bar in 2011; Joined the Firm in 2019	Employment & Labor	\$495	5.50	\$2,722.50
George L. Medina	Senior Paralegal	Restructuring Insolvency & Bankruptcy	\$360	7.80	\$2,808.00
Barbara J. Fullerton	Supervisor, Research Services	Knowledge/Practice Innovation	\$350	0.30	\$105.00
Mica L. Maddry	Research Specialist	Knowledge/Practice Innovation	\$350	1.80	\$630.00
Kathryn Howard	Senior Paralegal	Restructuring Insolvency & Bankruptcy	\$340	5.80	\$1,972.00
Jack I. Milko	Paralegal	Capital Markets	\$320	0.30	\$96.00
Constantine Theodore	Paralegal	Capital Markets	\$320	0.90	\$288.00

**Grand Total: \$1,155,705.00**  
**Total Hours 1,288.60**  
**Blended Rate: \$896.86**

**COMPENSATION BY PROJECT CATEGORY**

<b>Task Code</b>	<b>Matter Description</b>	<b>Total Hours Billed</b>	<b>Total Fees Requested</b>
B100	Administration	6.30	\$4,496.00
B110	Case Administration	148.40	\$118,550.50
B120	Asset Analysis and Recovery	63.00	\$48,067.00
B130	Asset Disposition	290.70	\$299,262.50
B140	Relief from Stay/Adequate Protection Proceedings	19.30	\$11,732.00
B150	Meetings of/and Communications with Creditors	9.90	\$9,973.00
B160	Fee/Employment Applications	3.20	\$2,888.00
B170	Fee/Employment Objections	4.40	3,058.00
B180	Avoidance Action Analysis	0.70	\$847.00
B185	Assumption/Rejection of Leases and Contracts	42.60	\$28,599.50
B190	Other Contested Matters (excl. assumption/rejection motions)	43.60	\$36,645.50
B210	Business Operations	9.80	\$9,574.50
B220	Employee Benefits/Pension	29.20	\$25,161.50
B230	Financing/Cash Collections	350.20	\$324,965.00
B260	Board of Directors Matters	23.70	\$19,825.00
B300	Claims and Plan	6.00	\$3,926.50
B310	Claims Administration and Objections	13.30	\$10,011.00
B320	Plan and Disclosure Statement (incl. Business Plan	82.40	\$77,754.00
B400	Bankruptcy-Related Advice	4.10	\$3,157.00
B410	General Bankruptcy Advice/Opinions	1.80	\$630.00
EMP	Employee matters	135.10	\$115,870.50
INS	Insurance	0.70	\$553.00
WARNACT	Warn Act Issues	0.20	\$158.00
<b>Total</b>		<b>1,288.60</b>	<b>\$1,155,705.00</b>

**EXPENSE SUMMARY**

<b>Expense Category</b>	<b>Service Provider (if applicable)</b>	<b>Total Expenses</b>
Corporate Fees	Corporate Fees Certificates of Good Standing and Articles of Incorporation for J. Nelson.	\$1,010.77
Delivery and Postage	Ace Attorney 476322 Del Priority To Sam Maizel	60.78
	Ace Attorney 476322 Del Priority To Tania Moyron	26.68
Outside Professional Services	Dentons Bingham Greenebaum invoice 4527679 for professional services rendered through July 31, 2022.	\$21,932.00
Research Fees (Lexis)	Sarah Schrag	\$144.50
Research Fees (Westlaw)	Sarah Schrag	\$32.50
	David F. Cook	\$150.00
	Hudson Overcash	\$2,258.29
	Demadeep Kaur	\$1,517.01
	Mica Maddry	\$600.00
	George Medina	\$509.88
<b>Total Disbursements Requested</b>		<b>\$28,242.41</b>

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FIRST GUARANTY MORTGAGE  
CORPORATION, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-10584 (CTG)

(Jointly Administered)

Objection Deadline: December 14, 2022 at 4:00 p.m.  
(prevailing Eastern Time)

**SUMMARY OF SECOND MONTHLY FEE APPLICATION OF  
DENTONS US LLP AS COUNSEL FOR THE DEBTORS AND  
DEBTORS IN POSSESSION, FOR ALLOWANCE  
OF COMPENSATION AND REIMBURSEMENT OF EXPENSES  
FOR THE PERIOD FROM AUGUST 1, 2022 THROUGH AUGUST 31, 2022**

Pursuant to §§ 330 and 331 of title 11 of the United States Code (the “Bankruptcy Code”) and Rule 2016 of the Federal Rules of Bankruptcy Procedure (collectively, the “Bankruptcy Rules”), and the *Order (I) Approving Procedures for (A) Interim Compensation and Reimbursement of Expenses of Retained Professionals and (B) Expense Reimbursement for Official Committee Members and (II) Granting Related Relief* [Docket No. 268] entered on August 2, 2022 (the “Administrative Order”), Dentons US LLP (“DUS” or the “Firm”), counsel to the debtors and the debtors in possession in the above-captioned cases (the “Debtors”), hereby submits its *Second Monthly Application for Compensation and for Reimbursement of Expenses for the Period from August 1, 2022 through August 31, 2022* (the “Application”).

By this Application, DUS seeks a monthly interim allowance of compensation in the amount of \$1,155,705.00 and actual and necessary expenses in the amount of \$28,242.41 for a total

<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s tax identification number, are: First Guaranty Mortgage Corporation (9575); and Maverick II Holdings, LLC (5621). The location of the corporate headquarters and the service address for First Guaranty Mortgage Corporation is 5800 Tennyson Parkway, Suite 450, Plano, TX 75024.

allowance of \$1,183,947.41 and payment of \$924,564.00 (80% of the allowed fees) and reimbursement of \$28,242.41 (100% of the allowed expenses) for a total payment of \$952,806.41 for the period August 1, 2022, through August 31, 2022 (the “Interim Period”). In support of this Application, DUS respectfully represents as follows:

### **Background**

1. On June 30, 2022 (the “Petition Date”), the Debtors filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code. The Debtors operated and managed their businesses as debtors in possession pursuant to §§ 1107(a) and 1108 of the Bankruptcy Code, and the Court confirmed the Amended Combined Disclosure Statement and Chapter 11 Plan by order entered November 2, 2022 [Docket No. 671]. No trustee or examiner has been appointed in the Debtors’ chapter 11 cases.

2. The Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2).

3. The Administrative Order authorizes certain professionals (“Professionals”) to submit monthly applications for interim compensation and reimbursement for expenses, pursuant to the procedures specified therein. The Administrative Order provides, among other things, that a Professional may submit monthly fee applications. If no objections are made within fourteen (14) days after service of the monthly fee application the Debtors are authorized to pay the Professional eighty percent (80%) of the requested fees and one hundred percent (100%) of the requested expenses. Beginning with the period ending September 30, 2022, and at three-month intervals thereafter, each of the Professionals shall file and serve an interim application for allowance of the amounts sought in its monthly fee applications for that period. All fees and expenses paid are on an interim basis until final allowance by the Court.

4. The Court approved the retention of DUS, effective as of June 30, 2022, by its *Order Authorizing and Approving the Retention of Dentons US LLP as Counsel to the debtors and debtors in possession Effective as of June 30, 2022* [Docket No. 277] (the “Retention Order”). The Retention Order authorized DUS to be compensated on an hourly basis and to be reimbursed for actual and necessary out-of-pocket expenses.

**DUS APPLICATION FOR COMPENSATION  
AND FOR REIMBURSEMENT OF EXPENSES**

5. All services for which DUS requests compensation were performed for or on behalf of the Debtors.

6. DUS has received no payment and no promises for payment from any source other than the Debtors for services rendered or to be rendered in any capacity whatsoever in connection with the matters covered by this Application. There is no agreement or understanding between DUS and any other person other than the partners of DUS for the sharing of compensation to be received for services rendered in these cases.

**Fee Statements**

7. The fee statement for the Interim Period is attached hereto as **Exhibit A**. This statement contains daily time logs describing the time spent by each attorney and paraprofessional during the Interim Period. To the best of DUS’ knowledge, this Application complies with §§ 330 and 331 of the Bankruptcy Code and the Bankruptcy Rules. DUS’ time reports are initially handwritten by the attorney or paralegal performing the described services. The time reports are organized daily. DUS is particularly sensitive to issues of “lumping” and unless time was spent in a one-time frame on a variety of different matters for a particular client, separate time entries are outlined in the time reports. DUS’s charges for its professional services are based upon the time,

nature, extent, and value of such services and the cost of comparable services other than in a case under the Bankruptcy Code.

#### **Actual and Necessary Expenses**

8. A summary of actual and necessary expenses incurred by DUS for the Interim Period is attached hereto as part of **Exhibit A**. DUS represents that: (i) it does not charge for internal printing; (ii) it does not charge for outgoing or incoming facsimile transmissions in bankruptcy matters; and (iii) with respect to providers of on-line legal research services (e.g., LEXIS and WESTLAW), there is no surcharge for computerized legal research.

9. DUS believes the foregoing rates are the market rates that the majority of law firms charge clients for such services. In addition, DUS believes that such charges are in accordance with the American Bar Association's ("**ABA**") guidelines, as set forth in the ABA's Statement of Principles, dated January 12, 1995, regarding billing for disbursements and other charges.

#### **Summary of Services Rendered**

10. The names of the partners and associates of DUS who have rendered professional services in these cases during the Interim Period, as well as the paralegals and research assistants of DUS who provided services to these attorneys during the Interim Period, are set forth in the attached **Exhibit A**.

11. DUS by and through such persons, has prepared and assisted in the preparation of various motions and orders submitted to the Court for consideration, and advised the Debtors on a regular basis with respect to various matters in connection with the Debtors' chapter 11 cases, and performed all necessary professional services which are described and narrated in detail below. DUS's efforts were extensive due to the size and complexity of the Debtors' chapter 11 cases.

### **Summary of Services by Project**

12. The services rendered by DUS during the Interim Period can be grouped into the categories set forth below. DUS attempted to place the services provided in the category that best relates to such services. However, because certain services may relate to one or more categories, services pertaining to one category may in fact be included in another category. These services performed, by categories, are generally described below, with a more detailed identification of the actual services provided set forth in the attached **Exhibit A**. **Exhibit A** identifies the attorneys and paraprofessionals who rendered services relating to each category, along with the number of hours for each individual and the total compensation sought for each category.

13. **Administration B100** Work performed by DUS in this category of service included: ensuring all deadlines and hearings in this complex case were regularly and properly docketed; analyzing critical dates memoranda prepared by local counsel and related issues; researching automatic stay issues regarding the Government National Mortgage Association (“**GNMA**”); and communications regarding schedules of assets and liabilities (the “**Schedules**”) and related global notes.

**Fees: \$4,496.00      Hours: 6.30**

14. **Case Administration B110** During the second month of the case, DUS: participated in multiple calls with the Chief Restructuring Officer (the “**CRO**”), FTI Consulting (together with the CRO, “**FTI**”), and Kurtzman Carson Consultants, LLC (“**KCC**”), regarding an array of topics, including discussions on the preparation of the Schedules and the Statement of Financial Affairs; prepared for and attended the second day of hearings on “first day motions” on August 2, 2022; prepared and finalized the *Debtors’ Witness and Exhibit List for Hearing* [Docket No. 245] and the *Reply In Support Of Debtors’ Motion To Obtain Debtor In Possession Financing*

[Docket No. 249] , both in connection therewith; prepared and filed the *Final Order (I) Authorizing The Debtors To Obtain Post-Petition Operational Cash Flow Financing; (II) Authorizing The Debtors To Use Cash Collateral; (III) Granting Liens And Providing Super-Priority Administrative Expense Status; (IV) Granting Adequate Protection; (V) Modifying The Automatic Stay; and (VI) Granting Related Relief* [Docket No. 292]; analyzed the stipulation to lift the automatic stay filed by Flagstar Bank FSB (“Flagstar Bank”) and related issues; researched various issues, including issues related to insider status inquiries; continued discussions with FTI and the Debtors on asset sales; conducted internal and external conferences regarding resolution of issues with GNMA; conferred with FTI and Pachulski, Stang, Ziehl & Jones (“PSZJ”) regarding the then upcoming 341(a) meeting of creditors, which DUS attended on August 9, 2022; prepared and considered drafts of a plan and disclosure statement and related asset sale strategies; analyzed final orders on motions for relief from automatic stay filed by Customers’ Bank and Flagstar Bank; prepared for and attended the hearing on August 11, 2022, on the Key Employee Incentive Plan (“KEIP”) and the Key Retention Employer Program (“KERP”); responded to the US Department of Justice and Federal National Mortgage Association (“Fannie Mae”) on bankruptcy issues and the bankruptcy process; worked with FTI to respond to requests for information from and consulted with the UCC the UCC’s financial advisors; reviewed and responded to the United States Trustee regarding personal information transfers; and drafted a comprehensive chapter 11 case workstream memorandum.

**Fees: \$118,052.50    Hours: 147.80**

15. **Asset Analysis and Recovery B120:** This category includes DUS’ review, consideration, and preparation of the two comprehensive settlement term sheets and related issues (i) between the Debtors and the Federal Home Loan Mortgage Corporation (“Freddie Mac”), and

(ii) the Debtors and Fannie Mae; preparation finalization of the *Debtors' Motion For An Order (I) Approving A Settlement Agreement With The Federal National Mortgage Association Pursued To Federal Rule Of Bankruptcy Procedure 9019, (II) Authorizing The Sale Of Certain Mortgage And Loans, (III) Granting Related Relief* [Docket No. 341] (the "Freddie Mac Motion"), and the *Debtors' Motion For Entry Of An Order Approving Stipulation Between Debtors And Fannie Mae For The Provision Of Adequate Protection And Adequate Insurances Related To The Servicing Of Fannie Mae's Loans* [Docket No. 393] (the "Fannie Mae Motion", and when referred to collectively, the "Freddie Mac and Fannie Mae Motions"), and preparation for and attendance at the August 31, 2022 and September 8, 2022 hearings thereon.

**Fees: \$48,067      Hours: 63.00**

16. **Asset Disposition B130:** During this period, DUS reviewed and revised the BSI Financial Services ("BSI") MSR "letter of intent," and prepared and finalized the *Debtors' Motion For Entry Of Order (I) Authorizing (A) Private Sale And (B) Transfer Of Certain Servicing Rights And Obligations To BSI Financial Services Free And Clear Of Liens, Claims, Encumbrances And Interests; (II) The Terms Of The Purchase And Sale Agreement; (III) Approving The Assumption And Assignment Certain Executory Contracts; And (IV) Granting Rebated Relief* [Docket No. 328] (the "BSI MSR Sale Motion"); conferred with FTI, the UCC and counsel for Planet Home and Rushmore Loan Management Services, LLC ("Rushmore"), regarding the BSI MSR Sale Motion, and attended the hearing on August 31, 2022 on the BSI MSR Sale Motion, which was granted; conducted internal and external conference calls regarding the disposition of assets and sale proceeds; conducted internal and external telephone conferences on the sale of loans to Freddie Mac; considered and engaged in telephone calls with Flagstar Bank's counsel on Flagstar Bank's motion for relief from the automatic stay; analyzed and conferred on matters related to the Debtors'

request re “scratch and dent loans”; engaged in internal and external conferences regarding Fannie Mae over the settlement term sheet; reviewed and responded to E-Mails with members of the Debtors’ board of directors on reorganization considerations; reviewed and considered the Debtors’ interest in purchasing assets; engaged in internal and external calls regarding the non-qualified mortgage (“NQM”) loan sale and revised the NQM loan purchase “letter of intent”; considered the “termination notice” received from Massachusetts Mutual; reviewed and conducted internal conference on and prepared and circulated drafts of the proposed orders to counsel for Freddie Mac and Fannie Mae on the related term sheets and motions.

**Fees: \$299,185.50      Hours: 290.60**

17. **Relief from Stay / Adequate Protection Proceedings B140:** This category relates to DUS’ engagement on motions for relief from the automatic stay, including analysis and resolution of *Customer Banks’ Motion Seeking Confirmation Of Applicability Of 11 U.S.C. Section 559 Or, In The Alternative, Granting Relief From The Automatic Stay And Related Relief*, on which an order was entered granting the motion on August 2, 2022 [Docket No. 271] and *Flagstar Bank, FSB’s Motion From Relief From The Automatic Stay Pursued To 11 U.S.C. § 362(d)*, on which an order was entered granting the motion on August 11, 2022 [Docket No. 317]. In connection with Customer Bank’s motion, DUS considered various issues; conferred with the Debtors, FTI, the cash flow DIP lender, and other third parties; and prepared a response thereto [Docket No. 246].

**Fees: \$11,696.00      Hours: 19.20**

18. **Meetings Of and Communications With Creditors B150:** This category included DUS’ telephone calls with the United States Department of Justice regarding GNMA issues; internal conferences regarding False Claim Act (“FCA”) claim issues; responding to one or more homeowners, or former homeowners, regarding the bankruptcy case and its effect;

consideration of severance issues; telephone conferences with the UCC regarding the BSI MSR Sale Motion; internal consideration of the Alpha Mortgage loan purchase inquiry and the Anchor Mortgage purchase; and review of historical financing information.

**Fees: \$9,973.00      Hours: 9.90**

19. **Fee / Employment Applications B160:** In connection with employment related matters, during this time period, DUS prepared and filed a *Supplemental Declaration Of Sam Maizel In Support Of Application To Retain Dentons* [Docket No. 260]; prepared, filed and obtained entry on August 2, 2022, of an *Order Pursuant To Section 327(a) Of The Bankruptcy Code, Rule 2014 The Federal Rules Of Bankruptcy Procedure And Local Rule 2014-1 Authorizing The Employment And Retention Of Dentons As Counsel For the Debtors and Debtors In Possession* [Docket No. 277]; and prepared, filed and obtained entry on August 2, 2022, of an *Order (I) Authorizing Employment And Payment Of Professionals Utilizing The Ordinary Course Of Business (II) Granting Related Relief* [Docket No. 281]; and prepared, filed and obtained entry on August 10, 2022, of the *Order Authorizing The Debtors (I) To Employ And Retain FTI Consulting, Inc, To Provide The Debtors A Chief Restructuring Officer And Certain Additional Personnel, And (II) Designating Tanya Meerovich As Chief Restructuring Officer For The Debtors Effective As Of The Petition Date* [Docket No. 311].

DUS also reviewed and considered the UCC's *Application To Employ/Retain Blank Rome LLP As Delaware Counsel* [Docket No. 344], the UCC's *Application To Employ/Retain Berkeley Research Group, LLC, As Financial Advisor* [Docket No. 335], and the UCC's *Application To Employ/Retain Thompson Coburn Hahm And Hessen LLP As Counsel To The Official Committee Of Unsecured Creditors* [Docket No. 349].

**Fees: \$2,880.00      Hours: 3.20**

20. **Fee / Employment Objection B170:** Included in this category of service is DUS' preparation of a supplemental declaration of Tanya Meerovich; preparation of a revised final wage order to effectuate a settlement with the UCC; and the review and consideration of matters set for hearing on August 2, 2022, including the Debtors' application to employ DUS as its counsel.

**Fees: \$3,058.00      Hours: 4.40**

21. **Avoidance Action Analysis B180:** This category of service included DUS' communications regarding discovery sought by the UCC; review of financial statements relating to discovery sought by the UCC; and the review of files related to the PIMCO transactions.

**Fees: \$847.00      Hours: 0.70**

22. **Assumptions / Rejection Of Leases And Contracts B185:** This category of service included DUS' work in connection with: preparing, filing, and obtaining entry of an order on August 28, 2022, on the *Debtors' Motion For An Order (I) Authorizing Debtors To (A) Reject Certain Unexpired Leases Effective As Of July 29, 2022; And (B) Abandoned Certain Property Associated There; (II) Granting Certain Related Relief* (the "Lease Rejection Motion") [Docket No. 244]; analyzed issues "related to retro action" rejection of a sub-leases; conferred on security deposits; conferred with eGlobal regarding its lease; considered the interaction of a lease agreement with a letter of credit; corresponded with landlord and sub-tenant regarding the return of a lease related payment, and conferences with counsel on a deposit for a lease; interaction with counsel for CFT NV Developments, LLC, regarding the Lease Rejection Motion; considered rejection damages and administrative expenses; conferred with counsel on the Lease Rejection Motion regarding the Henderson lease; and, reviewing Massachusetts Mutual's pool sale and servicing agreements.

**Fees: \$28,599.50      Hours: 42.60**

23. **Other Contested Matters B190:** Included in this category of service, are DUS' conferences on and preparation for the second day of hearings on August 2, 2022, on post-petition financing, cash collateral, employee retention, and a warehouse provider's motion relating to the warehouse loan provider's control, deposit and disposal of assets on a pre-petition warehouse line; worked on DIP Financing and KERP/KEIP; drafted the response to the Flagstar Bank's motion for relief from the automatic stay; considered information relating to the defense of WARN Act claims; drafted a notice of stipulation between the Debtors and Freddie Mac regarding adequate protection and insurance; and prepared documents relating to the BSI MSR Sale Motion and the Freddie Mac and Fannie Mae Motions, and prepared for and attended the hearings on August 31, 2022, which considered those three motions.

**Fees: \$37,157.50      Hours: 45.20**

24. **Business Operations B210:** Included in this category of work is DUS' analysis of E-Mails from O. Alaniz regarding the DIP financing order; review of correspondence regarding the resolution of a commercial lease claim; and internal conferences regarding "scratch and dent loans."

**Fees: \$9,574.50      Hours: 9.80**

25. **Employee Benefit / Pension B220:** Included in this category of service is DUS' preparation for and attendance at the hearing on August 2, 2022, on the *Motion Of Debtors For Entry Of Interim And Final Orders (I) Authorizing Debtors To (A) Pay Employee Obligations And (B) Continue Employee Benefit Programs, (II) Granting Related Relief* [Docket No. 9] (the "Employee Wage Motion"), and the *Motion Of Debtors For Entry Of Order (I) Approving Key Employee Incentive Program, (II) Key Retention Employer Program, and (III) Granting Related Relief* [Docket No. 160] (the "KEIP/KERP Motion"), on which orders were entered on August 12,

2022; internal analysis and conferences regarding the *Class Action Adversary Proceeding Complaint For Violation Of The WARN Act*, 29 U.S.C. § 2101 (“WARN Act Class Action”); conferences regarding KEIP/KERP; consideration of potential KERP payments, including the consideration of salary increases and the potential impact on KERP payments; and review of final drafts of KERP releases.

**Fees: \$25,161.50      Hours: 29.20**

26. **Financing / Cash Collections B230**: DUS’ services in this category related to complex financing matters that were critical to the Debtors’ successes in these chapter 11 cases. Among other things, DUS focused its attention on negotiating, resolving objections and related issues and obtained entry of orders on the *Debtors’ Motion For Entry Of Interim And Final Orders (I) Authorizing The Debtors To Enter Into A Repurchase Agreement Facility; (II) Authorizing The Debtors To Sell And Repurchase Mortgage Loans In The Ordinary Course Of Business (III) Granting Liens And Providing Super-Priority Administrative Expense Status; (IV) Modifying The Automatic Stay; (V) Scheduling A Final Hearing With Respect To The Relief Requested Herein; And (VI) Granting Related Relief* [Docket No. 20] (the “Repurchase Agreement Motion”), and the *Debtors’ Motion To Approve Debtors-In-Possession Financing* [Docket No. 22] (the “DIP Financing Motion”), both of which motions had been filed on June 30, 2022, and on which there had been an initial hearing on July 1, 2022. DUS negotiated and obtained resolution of issues raised by objecting parties, including, among others, Customers Bank, Flagstar Bank, South Street Security, LLC, Fannie Mae, Rushmore, and the Office of the United States Trustee. The result of DUS’ efforts was the entry of orders [Docket Nos. 288 and 292] approving the Repurchase Agreement Motion and the DIP Financing Motion on August 4, 2022. Also in this category of service, DUS reviewed revisions to cash flow projections regarding the DIP Financing Motion;

conducted conferences on adequate protection of warehouse lender cash collateral; reviewed, considered and resolved the availability of Barclays Bank’s warehouse line; worked with Signature Bank on the Deposit Account Control Agreement; worked with Freddie Mac on revising a Freddie Mac term sheet; interacted with the Debtors, FTI, the cash flow DIP lender, Customers Bank regarding terms of a § 559 lift stay order; considered loan agreement interest rate questions with FTI; reviewed and considered a Notice of Liquidation from Texas Commerce Bank (“TCB”); interacted with counsel for Customers Bank on default rate interest; reviewed and revised the Fannie Mae and the Freddie Mac Adequate Insurances Stipulation; reviewed and analyzed the revised BSI letter of intent; prepared the BSI MSR Sale Motion, exchanged correspondence, E-Mails and engaged in telephone calls on the motion; reviewed, analyzed and prepared comments on the BSI Purchase and Sale Agreement and Interim Servicing Agreement; responded to warehouse lender demands for asset turnover; analyzed issues related to transfer of funds to TCB; analyzed and considered refunds of closing costs overcharges to consumer borrowers; analyzed and advised the Debtor on provisions of pre-petition working capital loan agreements and reviewed and analyzed the motion to approve the Freddie Mac settlement; reviewed cash flow DIP lender questions regarding the GSC Settlement Term Sheet; exchanged correspondence regarding the NQM asset sale; analyzed issues related to Deutsche Bank; reviewed Massachusetts Mutual agreements and allocations charts regarding Massachusetts Mutual’s servicing rights; prepared the Rushmore letter agreement and exchanged communications with Rushmore’s counsel on completing a letter agreement; reviewed and analyzed the JVB Financial Group (“JVB”) trust termination letters and exchanged correspondence with representatives for JVB; reviewed Barclays Bank’s DIP “Master Repurchaser Agreement” and engaged in communications with a representative of Barclays Bank regarding principal and interest remittances to Barclays Bank;

prepared the “Rushmore Letter Agreement”; prepared and updated a cash flow analysis on the DIP loan; exchanged correspondence re the A&R “Customers Loan Agreement” and Fannie Mae pledged receivables; attended the hearings on August 31, 2022, on the BSI MSR Sale Motion, and the Freddie Mac and Fannie Mae Motions; and conferred with the Debtors, FTI, and other third parties on the foregoing.

**Fees: \$326,485.50      Hours: 350.60**

27. **Board Of Directors Matters B260:** This category of service includes DUS: prepared for, attended, and made presentations to the Debtors’ Board of Directors at ten meetings, including updates to the Board on letters of intent, warehouse lenders, KERP/KEIP, the BSI MSR Sale Motion, the status of negotiations and agreements reached with Freddie Mac and Fannie Mae, reorganization issues, and the sales of assets.

**Fees: \$19,825.00      Hours: 23.70**

28. **Claims And Plan B300:** This category of service includes DUS’ conferences with FTI on plan issues; analysis of a draft plan; preliminary comments on and revisions to a draft plan; and consideration of the inter-relationship between the plan and loan settlement claims.

**Fees: \$3,926.50      Hours: 6.00**

29. **Claims Administration And Objections B310:** In connection with this category of service, DUS: considered the SourcePoint critical vendor treatment; obtained entry of an order on August 2, 2022, on the *Motion Of The Debtors For Entry Of The Interim And Final Orders (A) Authorizing Debtors To Pay Pre-Petition Claims Of Critical Vendors And (B) Granting Related Relief* [Docket No. 7] (the “Critical Vendors Motion”); prepared and filed on August 12, 2022, the *Debtors’ Motion For Entry Of An Order (I) Setting Bar Dates For Filing Proofs Of Claim, Including Request For Payment Under Section 503(B)(9), (II) Setting a Bar Date For The Filing*

*of Proofs Of Claim By Governmental Units, (III) Setting A Bar Date For The Filing Of Requests For Allowance Of Administrative Expense Claims, (IV) Establishing Amended Schedules Bar Date And Rejection Damage Bar Date, (V) Approving The Form Of And Manner For Filing Proofs Of Claims, (VI) Approving Notice Of Bar Dates, (VII) Granting Related Relief [Docket No. 324]; researched the dischargeability of FCA claims; reviewed and responded to inquiries on § 525 regarding arguments regarding GSC licenses; and considered obligations due Deutsche Bank.*

**Fees: \$10,011.00      Hours: 13.30**

30. **Plan And Disclosure Statement B320:** Included in this category of service are DUS' conferences with the Debtors and FTI on plan formation issues; analysis of a proposed plan and disclosure statement and various potential structures; conferences with PSZJ and cash flow DIP lender regarding plan issues; consideration of reorganization transaction costs; review of claim classification and other related matters; consideration of cash distributions state licenses; and review of a timeline for a plan and sale process.

**Fees: \$77,754.00      Hours: 84.20**

31. **Bankruptcy Related Advice B400:** DUS' services in this category, included: conferring with the client regarding DACAs; reviewing and commenting on a draft stipulation from Fannie Mae regarding "frozen account issues"; reviewing Flagstar Banks' motion for relief from stay, the declaration in support of Flagstar Bank's motion and proposed order on the motion, including conferences with counsel for Flagstar Bank; and coordinated with FTI and Rushmore's counsel on Rushmore serviced loans.

**Fees: \$3,157.00      Hours: 4.10**

32. **General Bankruptcy Advise / Opinions B410:** In connection with this category of service, DUS conducted research regarding notice of termination of contract rights for Dee

Kaur; and conducted a review of judicial decisions in the Third Circuit for recent discussions on the separate classification of claims in bankruptcy cases.

**Fees: \$630.00      Hours: 1.80**

33. **Employee Matters EMP:** In connection with this category of service, DUS: discussed WARN Act notice periods, liability issues and conferred on notices to governmental entities regarding WARN Act Notices; analyzed issues relating to KERP/KEIP potential resolutions of those issues and considered the Claims from KERP recipients and WARN Act requirements for delayed layoffs; reviewed and analyzed communications to employees on layoffs and research regarding allowability of deductions from wage payments; reviewed and responded to internal and external communications regarding resolution of employee payment issues; participated in KERP/KEIP calls and conferences both internally and externally; researched WARN Act procedures and associated issues; prepared and analyzed various employee agreements and releases; reviewed the work force list provided to DUS by the Debtors and considered the Older Workers Benefit Protection Act; analyzed, drafted and evaluated the contents of an updated WARN Act Notice; attended the hearing on August 11, 2022, on KERP/KEIP; engaged in external communications regarding KERP payment questions; analyzed issues related to potential WARN Act claims defenses and conferred with the Debtor on KEIP/KERP; revised the KERP release; conferred with the Debtors and FTI regarding the foregoing and related employee matters.

**Fees: \$115,870.50      Hours: 135.10**

34. **Insurance INS:** Included in this category of service is DUS' analysis of surety bonds.

**Fees: \$553.00      Hours: 0.70**

35. **WARN Act Issues WARN ACT:** This category service included the analysis of WARN Act Releases.

**Fees: \$158.00**

**Hours: 0.20**

**DUS PROFESSIONALS**

36. Attorneys and paraprofessionals of DUS expended a total of 1,288.60 hours in connection with their representation of the Committee during the Interim Period, as follows:

<b>Name of Professional Individual</b>	<b>Position of the Applicant, Year of Obtaining License to Practice, Year of Joining the Firm</b>	<b>Department</b>	<b>Hourly Billing Rate</b>	<b>Total Interim Hours Billed</b>	<b>Total Interim Compensation</b>
Salvatore O. Franco	Partner - Admitted to the Bar in 1996; Joined the Firm in 1997	Capital Markets	\$1,340	5.50	\$7,370.00
Claude D. Montgomery	Partner - Admitted to the Bar in 1984; Joined the Firm in 2002	Restructuring Insolvency & Bankruptcy	\$1,210	133.10	\$161,051.00
Lynn P. Harrison, III	Partner - Admitted to the Bar in 1984; Joined the Firm in 2020	Restructuring Insolvency & Bankruptcy	\$1,140	129.60	\$147,744.00
Jeffrey J. Murphy	Partner - Admitted to the Bar in 1984; Joined the Firm in 1985	Capital Markets	\$1,045	17.30	\$18,078.50
E. Lee Smith	Partner - Admitted to the Bar in 1986; Joined the Firm in 2003	Capital Markets	\$1,025	78.80	\$80,770.00
Sam J. Alberts	Partner - Admitted to the Bar in 1993; Joined the Firm in 2011	Restructuring Insolvency & Bankruptcy	\$990	16.40	\$16,236.00
Sandra McCandless	Partner - Admitted to the Bar in 1973; Joined the Firm in 1994	Employment & Labor	\$985	54.80	\$53,978.00
Samuel R. Maizel	Partner - Admitted to the Bar in 1985; Joined the Firm in 2015	Restructuring Insolvency & Bankruptcy	\$970	150.90	\$146,373.00
Robert E. Richards	Partner - Admitted to the Bar in 1988; Joined the Firm in 1988	Restructuring Insolvency & Bankruptcy	\$940	0.10	\$94.00
Roger K. Heidenreich	Partner - Admitted to the Bar in 1983; Joined the Firm in 1983	Commercial Litigation	\$930	0.80	\$744.00
Christopher D. O'Leary	Partner - Admitted to the Bar in 2009; Joined the Firm in 2014	Capital Markets	\$850	102.70	\$87,295.00
Tania M. Moyron	Partner - Admitted to the Bar in 2005; Joined the Firm in 2017	Restructuring Insolvency & Bankruptcy	\$790	256.10	\$202,319.00
Geoffrey M. Miller	Partner - Admitted to the Bar in 2012; Joined the Firm in 2014	Restructuring Insolvency & Bankruptcy	\$770	93.90	\$72,303.00

<b>Name of Professional Individual</b>	<b>Position of the Applicant, Year of Obtaining License to Practice, Year of Joining the Firm</b>	<b>Department</b>	<b>Hourly Billing Rate</b>	<b>Total Interim Hours Billed</b>	<b>Total Interim Compensation</b>
Lauren M. Macksoud	Partner - Admitted to the Bar in 2003; Joined the Firm in 2017	Restructuring Insolvency & Bankruptcy	\$770	74.40	\$57,288.00
Hudson J. Overcash	Senior Managing Associate - Admitted to the Bar in 2014; Joined the Firm in 2021	Capital Markets	\$740	5.00	\$3,700.00
Casey W. Doherty, Jr.	Senior Managing Associate - Admitted to the Bar in 2011; Joined the Firm in 2021	Restructuring Insolvency & Bankruptcy	\$695	17.50	\$12,162.50
Jeffrey C. Nelson	Managing Associate - Admitted to the Bar in 2017; Joined the Firm in 2017	Capital Markets	\$680	.90	\$612.00
Sarah M. Schrag	Managing Associate - Admitted to the Bar in 2016; Joined the Firm in 2016	Restructuring Insolvency & Bankruptcy	\$650	59.50	\$38,675.00
David F. Cook	Managing Associate - Admitted to the Bar in 2017; Joined the Firm in 2019	Restructuring Insolvency & Bankruptcy	\$620	37.90	\$23,498.00
Demadeep Kaur	Associate - Admitted to the Bar in 2020; Joined the Firm in 2019	Capital Markets	\$570	11.50	\$6,555.00
Jessica Peterson	Associate - Admitted to the Bar in 2019; Joined the Firm in 2022	Employment & Labor	\$525	19.50	\$10,237.50
Nicole L. Hutson	Senior Managing Associate - Admitted to the Bar in 2011; Joined the Firm in 2019	Employment & Labor	\$495	5.50	\$2,722.50
George L. Medina	Senior Paralegal	Restructuring Insolvency & Bankruptcy	\$360	7.80	\$2,808.00
Barbara J. Fullerton	Supervisor, Research Services	Knowledge/Practice Innovation	\$350	0.30	\$105.00
Mica L. Maddry	Research Specialist	Knowledge/Practice Innovation	\$350	1.80	\$630.00
Kathryn Howard	Senior Paralegal	Restructuring Insolvency & Bankruptcy	\$340	5.80	\$1,972.00
Jack I. Milko	Paralegal	Capital Markets	\$320	0.30	\$96.00
Constantine Theodore	Paralegal	Capital Markets	\$320	.90	\$288.00

**Grand Total: \$1,155,705.00**  
**Total Hours 1,288.60**  
**Blended Rate: \$896.86**

37. The nature of work performed by these persons is fully set forth in **Exhibit A** attached hereto. These are DUS's normal hourly rates for work of this character. The reasonable value of the services rendered by DUS for the Debtors during the Interim Period is \$1,155,705.00.

38. In accordance with the factors enumerated in § 330 of the Bankruptcy Code, it is respectfully submitted that the amount requested by DUS is fair and reasonable given (a) the complexity of these chapter 11 cases, (b) the time expended, (c) the nature and extent of the services rendered, (d) the value of such services, and (e) the costs of comparable services other than in a case under the Bankruptcy Code. Moreover, DUS has reviewed the requirements of Del. Bankr. LR 2016-2 and the Administrative Order and believes that this Application complies with such Rule and Order.

WHEREFORE, DUS respectfully requests that the Court enter an order providing that, for the period of August 1, 2022, through August 31, 2022, an interim allowance be made to DUS for compensation in the amount of \$1,155,705.00 and actual and necessary expenses in the amount of \$28,242.41 for a total allowance of \$1,183,947.41 and payment of \$924,564.00 (80% of the allowed fees) and reimbursement of \$28,242.41 (100% of the allowed expenses) be authorized for a total payment of \$952,806.41; and for such other and further relief as this Court deems proper.

Dated: November 23, 2022  
Wilmington, Delaware

**PACHULSKI STANG ZIEHL & JONES LLP**

/s/ Mary F. Caloway  
Laura Davis Jones (DE Bar No. 2436)  
Timothy P. Cairns (DE Bar No. 4228)  
Mary F. Caloway (DE Bar No. 3059)  
919 North Market Street, 17th Floor  
P.O. Box 8705  
Wilmington, Delaware 19899 (Courier 19801)  
Tel: (302) 652-4100  
Fax: (302) 652-4400  
Email: [ljones@pszjlaw.com](mailto:ljones@pszjlaw.com)

[tcairns@pszjlaw.com](mailto:tcairns@pszjlaw.com)  
[mcaloway@pszjlaw.com](mailto:mcaloway@pszjlaw.com)

-and-

Samuel R. Maizel (admitted *pro hac vice*)  
Tania M. Moyron (admitted *pro hac vice*)  
**DENTONS US LLP**  
601 S. Figueroa Street #2500  
Los Angeles, CA 90017  
Telephone: (213) 623-9300  
Email: [samuel.maizel@dentons.com](mailto:samuel.maizel@dentons.com)  
[tania.moyron@dentons.com](mailto:tania.moyron@dentons.com)

Lauren Macksoud (admitted *pro hac vice*)  
Claude D. Montgomery (admitted *pro hac vice*)  
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David F. Cook (DE Bar No. 6352)  
**DENTONS US LLP**  
1900 K Street, NW  
Washington, DC 20006  
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Email: [david.f.cook@dentons.com](mailto:david.f.cook@dentons.com)

*Counsel for Debtors and Debtors in Possession*

**DECLARATION**

STATE OF CALIFORNIA            )  
                                                  ) ss.  
COUNTY OF LOS ANGELES    )

I, Samuel M. Maizel, hereby certify as follows:

1. I am a partner in the applicant firm, Dentons US LLP (“DUS”), and have been admitted to appear before this Court *pro hac vice*.

2. I have personally performed many of the legal services rendered by DUS, as counsel for the Debtors, and am thoroughly familiar with all other work performed on behalf of the Debtors by the lawyers and paraprofessionals in the firm.

3. The facts set forth in the foregoing Application are true and correct to the best of my knowledge, information, and belief. Moreover, I have reviewed the requirements of Rule 2016-2 of the Local Rules of Practice and Procedure of the United States Bankruptcy Court for the District of Delaware and submit that the Application complies with such requirements.

Dated: November 23, 2022

/s/ Samuel M. Maizel  
/s/ Samuel M. Maizel

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FIRST GUARANTY MORTGAGE  
CORPORATION, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-10584 (CTG)

(Jointly Administered)

**Objection Deadline: December 14, 2022, at 4:00  
p.m. (prevailing Eastern Time)**

**NOTICE OF FILING FEE APPLICATION**

**PLEASE TAKE NOTICE** that Dentons US LLP (“DUS”), counsel to the debtors and debtors in possession (the “Debtors”), in the above-captioned cases, has filed its *Second Monthly Application for Compensation and Reimbursement of Expenses of Dentons US LLP, as Counsel to the Debtors’ for the Period from August 1, 2022 through August 31, 2022* (the “Application”) seeking fees in the amount of \$1,155,705.00 and reimbursement of actual and necessary expenses in the amount of \$28,242.41 for the period from August 1, 2022 through August 31, 2022.

**PLEASE TAKE FURTHER NOTICE** that any objection or response to the Application must be made in writing and be filed with the United States Bankruptcy Court for the District of Delaware (the “Bankruptcy Court”), 824 N. Market Street, 3rd Floor, Wilmington, Delaware 19801, on or before **December 14, 2022, at 4:00 p.m. prevailing Eastern Time.**

**PLEASE TAKE FURTHER NOTICE** that at the same time, you must also serve a copy of the response or objection upon: (i) counsel for the Debtors: (a) Dentons US LLP, 601 S. Figueroa Street, #2500, Los Angeles, CA 90017 (Attn: Tania M. Moyron,

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<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s tax identification number, are: First Guaranty Mortgage Corporation (9575); and Maverick II Holdings, LLC (5621). The location of the corporate headquarters and the service address for First Guaranty Mortgage Corporation is 5800 Tennyson Parkway, Suite 450, Plano, TX 75024.

[tania.moyron@dentons.com](mailto:tania.moyron@dentons.com), and Samuel Maizel, [samuel.maizel@dentons.com](mailto:samuel.maizel@dentons.com)) and (b) Pachulski Stang Ziehl & Jones LLP, 919 North Market Street, 17th Floor, Wilmington, Delaware 19801 (Attn: Laura Davis Jones, [ljones@pszjlaw.com](mailto:ljones@pszjlaw.com)); (ii) Barclays Bank PLC: Hunton Andrews Kurth LLP, 200 Park Avenue, New York, NY 10166 (Attn: Peter S. Partee, [ppartee@huntonak.com](mailto:ppartee@huntonak.com)) and (Brian M. Clarke, [brianclarke@huntonak.com](mailto:brianclarke@huntonak.com)); and Potter Anderson & Corroon LLP, 1313 N. Market Street, 6th Floor, Wilmington, Delaware, 19801 (Attn. Jeremy W Ryan, [jryan@potteranderson.com](mailto:jryan@potteranderson.com)); (iii) counsel to LVS II SPE XXXIV LLC, Greenberg Traurig, LLP., (Attn: Nancy Peterman, [PetermanN@gtlaw.com](mailto:PetermanN@gtlaw.com)), (John D. Elrod, [ElrodJ@gtlaw.com](mailto:ElrodJ@gtlaw.com)), (Joseph Davis [DavisJ@gtlaw.com](mailto:DavisJ@gtlaw.com)), and (Danny Duerdoth, [duerdothD@gtlaw.com](mailto:duerdothD@gtlaw.com)); (iv) the Office of the United States Trustee, 844 King Street, Suite 2207 Lockbox 35, Wilmington, DE 19801, (Attn: Benjamin Hackman [benjamim.a.hackman@usdoj.gov](mailto:benjamim.a.hackman@usdoj.gov)); and (v) counsel for the Official Committee of Unsecured Creditors, (a) Thompson Coburn Hahn & Hessen LLP, 488 Madison Avenue, New York, NY 10022 (Attn: Mark S. Indelicato [mindelicato@thompsoncoburn.com](mailto:mindelicato@thompsoncoburn.com)), (Mark T. Power [mpower@thompsoncoburn.com](mailto:mpower@thompsoncoburn.com)) and (Joseph Orbach [jorbach@thompsoncoburn.com](mailto:jorbach@thompsoncoburn.com)); and (b) Blank Rome LLP, 1201 Market Street, Suite 800, Wilmington, DE 19801 (Attn: Regina Stango Kelbon, [regina.kelbon@blankrome.com](mailto:regina.kelbon@blankrome.com)), (Victoria A. Guilfoyle, [tori.guilfoyle@blankrome.com](mailto:tori.guilfoyle@blankrome.com)) and (Lorenzo R. Thomas III, [Lorenzo.thomas@blankrome.com](mailto:Lorenzo.thomas@blankrome.com)).

**PLEASE TAKE FURTHER NOTICE** that on August 2, 2022, the Bankruptcy Court entered the *Order (I) Approving Procedures for (A) Interim Compensation and Reimbursement of Expenses of Retained Professionals* (the “Order”) [Docket No. 268].

Pursuant to the Order, in the absence of timely filed objections or responses, and upon the filing with the Bankruptcy Court of a certification of no objection, the Debtors are authorized to

pay the professionals eighty percent (80%) of the fees, and one hundred percent (100%) of expenses without further notice or hearing. All fees and expenses paid to the professionals are subject to final approval by the Court.

**PLEASE TAKE FURTHER NOTICE THAT IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE APPLICATION WITHOUT FURTHER NOTICE OR HEARING.**

Dated: November 23, 2022  
Wilmington, Delaware

**PACHULSKI STANG ZIEHL & JONES LLP**

/s/ Mary F. Caloway

Laura Davis Jones (DE Bar No. 2436)  
Timothy P. Cairns (DE Bar No. 4228)  
Mary F. Caloway (DE Bar No. 3059)  
919 North Market Street, 17th Floor  
P.O. Box 8705  
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Fax: (302) 652-4400  
Email: [ljones@pszjlaw.com](mailto:ljones@pszjlaw.com)  
[tcairns@pszjlaw.com](mailto:tcairns@pszjlaw.com)  
[mcaloway@pszjlaw.com](mailto:mcaloway@pszjlaw.com)

-and-

Samuel R. Maizel (admitted *pro hac vice*)  
Tania M. Moyron (admitted *pro hac vice*)  
**DENTONS US LLP**  
601 S. Figueroa Street #2500  
Los Angeles, CA 90017  
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Email: [samuel.maizel@dentons.com](mailto:samuel.maizel@dentons.com)  
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Lauren Macksoud (admitted *pro hac vice*)  
Claude D. Montgomery (admitted *pro hac vice*)  
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David F. Cook (DE Bar No. 6352)  
**DENTONS US LLP**  
1900 K Street, NW  
Washington, DC 20006  
Tel.: (202) 496-7500  
Email: [david.f.cook@dentons.com](mailto:david.f.cook@dentons.com)

*Counsel for Debtors and Debtors in Possession*

**EXHIBIT A**

Fees

First Guaranty Mortgage Corporation  
Attn: Aaron Samples  
5800 Tennyson Parkway, Suite 450  
Plano TX 75024  
United States

November 23, 2022

**Invoice No. 2581247**

Client: 15810756

Payment Due Upon Receipt

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Total This Invoice \$ 1,183,947.41

Please return this page with your payment

In the case of mail deliveries to:

SNR Denton US LLP  
8000 Sears Tower  
Chicago, IL 60606

OR

In the case of overnight deliveries to:

SNR Denton US LLP  
Attention: Accounting  
233 South Wacker Drive  
Chicago, IL 60604-6404

Payment by wire transfer/ACH should be sent to:

Citi Private Bank  
227 W Monroe, Chicago, IL 60606  
ABA Transit # 271070801  
Account # 0801051693  
Account Name: Dentons US LLP  
Swift Code: CITIUS33

Reference Invoice # and/or client matter #

All payments must be in U.S. Dollars - Federal Tax I.D. Number 36-1796730

Questions relating to this invoice should be directed to:

S. Maizel  
at 1 213 623 9300

First Guaranty Mortgage Corporation  
 Attn: Aaron Samples  
 5800 Tennyson Parkway, Suite 450  
 Plano TX 75024  
 United States

November 23, 2022

**Invoice No. 2581247**

For Professional Services Rendered through August 31, 2022:

Matter: 15810756-000003  
 First Guaranty Mortgage Corporation

B100 - Administration

Date	Timekeeper	Hours	Amount	Task	Narrative
08/03/22	J. Milko	0.30	96.00	B100	Revised signature page packets for C. O'Leary; office correspondence with C. O'Leary re the matter.
08/08/22	G. Medina	0.20	72.00	B100	Review critical Dates Memo and send to Docketing for calendaring.
08/08/22	H. Overcash	0.40	296.00	B100	Call with L. Smith and S. Maizel to discuss research scope re GNMA.
08/08/22	H. Overcash	1.80	1,332.00	B100	Research automatic stay issues regarding GNMA.
08/14/22	H. Overcash	2.80	2,072.00	B100	Research automatic stay issues regarding GNMA and draft email response.
08/15/22	G. Medina	0.40	144.00	B100	Review and correspond with docketing regarding calendaring memo of critical deadlines received per the request of T. Moyron.
08/19/22	C. Montgomery	0.40	484.00	B100	Communications with G. Miller regarding margin call global note for schedules (.4).
	Subtotal	6.30	4,496.00		

B110 - Case Administration

Date	Timekeeper	Hours	Amount	Task	Narrative
07/01/22	C. Theodore	0.50	160.00	B110	Ordered certificates of good standing for J. Nelson.
07/05/22	C. Theodore	0.40	128.00	B110	Compiled and saved an Officer's Certificate for J. Nelson.

First Guaranty Mortgage Corporation  
Matter: 15810756-000003  
Invoice No.: 2581247

November 23, 2022

Date	Timekeeper	Hours	Amount	Task	Narrative
07/05/22	J. Nelson	0.90	612.00	B110	Prepare execution version of the Officer's Certificate and related closing deliverables (.6); manage preparation of the compiled version (.3).
07/26/22	G. Miller	0.10	77.00	B110	Call with FGMC, FTI and KCC re preparation of schedules and statements.
07/26/22	G. Miller	0.70	539.00	B110	Draft reply to objection of UCC to critical vendor motion.
07/26/22	G. Miller	0.40	308.00	B110	Call with FTI to discuss list of critical vendors.
07/26/22	G. Miller	0.30	231.00	B110	Circulate critical vendor list to Committee.
07/27/22	T. Moyron	0.10	79.00	B110	Prepare email to A. Samples re notice of appointment.
07/29/22	B. Fullerton	0.30	105.00	B110	Research registered agent information for MO and NV companies for Sarah Schrag, Sam Maizel, Tania Moyron, and Iris Ortiz.
08/01/22	G. Medina	0.30	108.00	B110	Correspond with L. Smith regarding hearing on August 2, 2022 (0.1); review agenda and register L. Smith for hearing (0.2).
08/01/22	S. Maizel	0.10	97.00	B110	Zoom conference with J. Jones, etc. re pending legal issues.
08/01/22	S. Maizel	0.50	485.00	B110	Zoom conference with L. Jones, T. Cairns, etc. re agenda and responsibilities for upcoming hearing.
08/01/22	T. Moyron	0.10	79.00	B110	Zoom conference with J. Jones, et al., re pending legal issues.
08/01/22	T. Moyron	0.50	395.00	B110	Zoom conference with L. Jones, T. Cairns, et al., re agenda and responsibilities for upcoming hearing.
08/01/22	D. Cook	0.20	124.00	B110	Analyze amended agenda in preparation for second day hearing.

First Guaranty Mortgage Corporation  
Matter: 15810756-000003  
Invoice No.: 2581247

November 23, 2022

Date	Timekeeper	Hours	Amount	Task	Narrative
08/01/22	L. Macksoud	17.10	13,167.00	B110	Calls and emails with counsel for Customers re status of 559 motion (1.5); calls and emails with Debtors and FTI re same and re settlement of order (.5); participate in prep sessions with FTI and Dentons working group in preparation for second day hearing (3.5); review and further revise DIP reply and supplemental declaration in support thereof (.8); call with C. Montgomery to discuss edits thereto and preparation for argument (2.0); calls and emails with DIP Lender re final order and filing thereof (1.4); call with A. Helman re section 345 issue in cash management order (.1); further prep session with FTI (1.0); draft and presentation is support of oral argument for cash management, cash flow dip order, and 559 motions (3.5); call with DIP Lender to discuss potential settlement with committee (.8); review filed statement in support by cash flow dip lender (.5); calls and emails with other parties in interest in preparation for second day hearing (1.5).
08/01/22	S. Schrag	0.20	130.00	B110	Review correspondence from L. Smith and C. Montgomery regarding servicing platform.
08/01/22	G. Miller	0.30	231.00	B110	Call with FTI, KCC and FGMC re schedules and statements.
08/01/22	G. Miller	0.10	77.00	B110	Finalize final critical vendor order and email same to M. Calloway.
08/01/22	G. Miller	0.60	462.00	B110	Review caselaw and emails with S. Maizel re definition of insider.
08/02/22	G. Miller	1.40	1,078.00	B110	Attend second day hearing and handle critical vendor motion.
08/02/22	G. Miller	0.20	154.00	B110	Call with FTI, KCC and FGMC re preparation of schedules and statements.

First Guaranty Mortgage Corporation  
Matter: 15810756-000003  
Invoice No.: 2581247

November 23, 2022

Date	Timekeeper	Hours	Amount	Task	Narrative
08/02/22	L. Macksoud	7.20	5,544.00	B110	Confer with counsel to committee re cash management order (.3), confer with counsel to Flagstar re stip to lift stay and presentation to court regarding same (.3), emails with counsel to Customers re proposed 559 order (.2), review revised settlement proposal from committee (.1) and confer with T. Moyron re same (.2), participate in second day hearing (4.4), debrief call to discuss next steps with C. Montgomery, L. Smith and T. Moyron (.5), call with FTI and company re upcoming asset sale strategy (1.0), review proposed revisions to Cash Flow DIP Order and confer with working group re same (.2).
08/02/22	G. Medina	0.40	144.00	B110	Correspond with L. Smith and register J. Murphy, S. Alberts and C. Doherty for August 2nd hearing.
08/02/22	C. Montgomery	0.10	121.00	B110	Review interim fee order.
08/02/22	C. Montgomery	2.00	2,420.00	B110	Attend Second day hearing.
08/02/22	T. Moyron	4.30	3,397.00	B110	Participate in Court hearing and related calls with N. Peterman, M. Power, et al., to resolve matters on calendar.
08/02/22	T. Moyron	0.50	395.00	B110	Call with S. Maizel re status of orders and other matters related to hearing.
08/02/22	T. Moyron	2.60	2,054.00	B110	Calls with L. Jones, M. Power, T. Meerovich, N. Peterman, et al., prior to Court hearing (.6); correspond with counsel for warehouse lenders prior to hearing, including J. Feldsher (.3); prepare for upcoming hearing and pleadings related to unresolved issues (1.7).
08/02/22	J. Murphy	2.10	2,194.50	B110	Attend zoom of hearing (1.8); follow up emails (.3).
08/02/22	S. Maizel	0.10	97.00	B110	Telephone conference with T. Moyron re hearing on pending motions.
08/03/22	T. Moyron	0.70	553.00	B110	Zoom call with M. Schwarzmman, N. Peterman, et al., re pending issues, including DIP Facilities orders.
08/03/22	T. Moyron	0.30	237.00	B110	Telephone conference with S. Maizel re pending issues.

First Guaranty Mortgage Corporation  
Matter: 15810756-000003  
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November 23, 2022

Date	Timekeeper	Hours	Amount	Task	Narrative
08/03/22	S. Maizel	0.70	679.00	B110	Zoom call with M. Schwarzmann, N. Peterman, etc. re pending issues, including DIP Facilities orders.
08/03/22	S. Maizel	0.30	291.00	B110	Telephone conference with T. Moyron re pending issues.
08/03/22	L. Macksoud	3.40	2,618.00	B110	Review and comment on draft stipulation to lift stay sent by counsel to Flagstar (.4), draft email to counsel to Flagstar re same (.1), confer with FTI and counsel to DIP Lender re DACA issue (.3), revise same and circulate to working group (.2) review communication from DIP Lender regarding application of proceeds from proceeds of sale of Customers Repo line (.2), calls and emails with Dentons working group to assess implications of same (.9), review committee edits to final cash flow dip order and confer with C. Montgomery re same (.5), draft email to committee counsel regarding requested changes (.2), confer with counsel to Cash Flow DIP Lender re same (.3), confer with FTI regarding implications of potential sale of Flagstar loans (.3).
08/03/22	G. Miller	0.40	308.00	B110	Research re insider standards.
08/03/22	G. Miller	0.10	77.00	B110	Call with FTI, FGMC and KCC re preparation of schedules and statements.
08/03/22	T. Moyron	0.40	316.00	B110	Prepare email to M. Schmergel at DOJ re GNMA letter (.1); analyze issues related to confidentiality agreement (.1), prepare email to T. Cairns re same (.1), and analyze email from M. Power re same (.1).
08/04/22	G. Miller	0.70	539.00	B110	Research and emails with S. Schrag re rejection of sublease (.5); Call with C. Doherty re same (.2).

First Guaranty Mortgage Corporation  
Matter: 15810756-000003  
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November 23, 2022

Date	Timekeeper	Hours	Amount	Task	Narrative
08/04/22	L. Macksoud	5.40	4,158.00	B110	Review further revisions to final Cash Flow DIP Order and calls and emails with counsel to Repo DIP Lender, Cash Flow DIP Lender, Flagstar and Committee to discuss same (2.6), finalize order and work with local counsel to get filed and entered by court (.7), call with FTI and FGMC working groups to discuss all ongoing assets sales and other open issues (1.0), follow up with T. Moyron re open work streams relating to funds to be released from Fannie and agreement to lift automatic stay with Flagstar (.3), confer with counsel to Flagstar re proposal to lift stay (.3), call with counsel to Fannie Mae to discuss stipulation and open issues (.5).
08/05/22	L. Macksoud	0.80	616.00	B110	Follow up with FTI, Company and counsel to DIP lender re DACA accounts (.2), review DIP Credit Agreement and confer with T. Meerovich re payment in DIP Lender fees (.4), call with S. Schrag to discuss sublease rejection and inadvertent payment (.2).
08/05/22	S. Maizel	0.20	194.00	B110	Telephone conference with T. Moyron re pending issues, including resolution of GNMA issues.
08/05/22	G. Miller	2.40	1,848.00	B110	Review research re rejection of sublease (.5); Calls and emails with C. Doherty, S. Schrag and T. Cairns re same (1.9).
08/05/22	T. Moyron	0.10	79.00	B110	Analyze correspondence from J. John, et al., re re-occurring call, Sourcepoint (.1). 110
08/06/22	S. Maizel	1.40	1,358.00	B110	Telephone conference with T. Moyron re negotiations with GNMA, and other pending issues (.5); review and respond to emails re GNMA June 14th NOV, etc. (.9).
08/06/22	S. Maizel	0.80	776.00	B110	Review and respond to emails from FTI re definition of an insider for SOFA/Schedules, etc.
08/08/22	T. Moyron	0.80	632.00	B110	Call with T. Meerovich, L. Jones re 341 meeting.
08/08/22	S. Maizel	0.10	97.00	B110	Zoom call with J. Jones, etc. re pending legal issues.

First Guaranty Mortgage Corporation  
Matter: 15810756-000003  
Invoice No.: 2581247

November 23, 2022

Date	Timekeeper	Hours	Amount	Task	Narrative
08/08/22	S. Maizel	0.10	97.00	B110	Review and respond to emails re insider definition.
08/08/22	S. Maizel	0.80	776.00	B110	Zoom call with FTI, PSZJ, etc. re 341(a) meeting.
08/08/22	T. Moyron	0.10	79.00	B110	Prepare email to M. Jacobson re Schedules/SOFA.
08/08/22	T. Moyron	0.30	237.00	B110	Correspond with counsel for Iron Mountain (.1) and J. Johnson, et al., re files and plans (.2).
08/08/22	T. Moyron	0.50	395.00	B110	Analyze 5 open issues related to confidentiality agreement with Committee and redline (.2) and call with T. Cairns re same (.3).
08/08/22	G. Miller	0.30	231.00	B110	Call with FGMC, FTI and KCC re preparation of schedules and statements.
08/08/22	G. Miller	0.10	77.00	B110	Follow up with J. John re storage of records postpetition.
08/08/22	S. Schrag	0.20	130.00	B110	Confer with T. Moyron and T. Meerovich regarding petitions.
08/08/22	J. Murphy	1.80	1,881.00	B110	Numerous emails re possible responses to Ginnie Mae re termination.
08/09/22	G. Miller	0.20	154.00	B110	Call with FTI, FGMC and KCC re preparation of schedules and statements.
08/09/22	D. Cook	0.40	248.00	B110	Revise case tracker for new tasks concerning agencies.
08/09/22	K.M. Howard	2.90	986.00	B110	Email exchange with S. Maizel regarding 8/11/22 hearing and related pleadings (.1); email exchange with T. Moyron regarding 8/11/22 hearing and related pleadings (.1); analysis of Notice of Agenda (.2); review and assemble pleadings, declarations and exhibits for all matters appearing before the court on 8/11/22 (1.5); reconcile culled pleadings with Notice of Agenda (.5); finalize assembled material (.2); email exchanges with I. Cruz regarding same (.1); coordinate delivery of hearing materials to S. Maizel and T. Moyron (.1); email exchange with S. Maizel regarding hearing materials (.1).

First Guaranty Mortgage Corporation  
Matter: 15810756-000003  
Invoice No.: 2581247

November 23, 2022

Date	Timekeeper	Hours	Amount	Task	Narrative
08/09/22	T. Moyron	0.30	237.00	B110	Prepare correspondence to Dentons related to priority items and timing deadlines with respect to sale, plan, and settlements with GSEs.
08/09/22	T. Moyron	0.30	237.00	B110	Plan timeline with respect to sale motion, 9019 motions, and plan process.
08/09/22	T. Moyron	0.30	237.00	B110	Analyze draft bar date motion (.2); exchange emails with T. Cairns re same (.1).
08/09/22	T. Moyron	0.10	79.00	B110	Analyze M. Caloway, et al., emails re stipulation between Debtors and Liberty Mutual.
08/09/22	T. Moyron	0.10	79.00	B110	Correspond with M. Hynald re SOFA.
08/09/22	T. Moyron	0.70	553.00	B110	Attend section 341(a) meeting with UST, L. Jones, T. Meerovich, creditors, et al. (.6); call with L. Jones re same (.1).
08/09/22	T. Moyron	0.80	632.00	B110	Conference call with T. Cairns, J. Orbach, and M. Indelicato re confidentiality agreement.
08/10/22	S. Maizel	0.20	194.00	B110	Telephone conference with T. Moyron re pending issues.
08/10/22	T. Moyron	0.10	79.00	B110	Correspond with M. Renzi re PEO and confidentiality agreement.
08/10/22	T. Moyron	0.20	158.00	B110	Correspond with J. Orback re confidentiality agreement.
08/10/22	T. Moyron	0.40	316.00	B110	Prepare memo regarding priority items and coordinate outstanding items that require resolution and/or attention.
08/10/22	C. Montgomery	0.90	1,089.00	B110	Participate in FTI, Dentons, FGMC case administration call (.9).
08/10/22	D. Cook	0.30	186.00	B110	Analyze T Moyron email regarding chapter 11 case tracker.

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Date	Timekeeper	Hours	Amount	Task	Narrative
08/10/22	L. Macksoud	7.30	5,621.00	B110	Review draft combined plan and disclosure statement and revise same (3.6), calls and emails with counsel for Flagstar (.9), and emails with Debtors and FTI regarding resolution of Flagstar motion to lift stay (.4), review, revise and finalize draft form of order resolving same (.7), call with Dentons and FTI working group re asset sales and other open issues (1.0), confer with counsel to Fannie re restricted funds stipulation (.3), confer with counsel to Rushmore re proposed final order on Flagstar motion (.4).
08/10/22	T. Moyron	0.20	158.00	B110	Telephone conference with S. Maizel re pending issues.
08/11/22	L. Macksoud	5.40	4,158.00	B110	Calls and emails with counsel for Flagstar and Rushmore regarding finalized order for motion for relief from stay, and mechanics of fund distributions going forward (.5); review hearing agenda and confer with local counsel re order of hearing (.1); review order entered by court (.1); confer with client re Flagstar sale as a result of entered order (.2); call with T. Moyron to discuss same (.2); call with C. Montgomery to discuss same (1.5); further draft and revise combined plan and disclosure statement (2.8).
08/11/22	G. Miller	0.40	308.00	B110	Call with KCC, FGMC and FTI re preparation of schedules and statements.
08/11/22	G. Miller	0.60	462.00	B110	Emails with J. John, M. Jacobson, S. Maizel and T. Moyron re ordinary course professionals (.5); Call with S. Maizel re same (.1).
08/11/22	C. Montgomery	0.30	363.00	B110	Attend Hearing in KEIP/KERP issues (excluding adjournments).
08/11/22	T. Moyron	0.20	158.00	B110	Analyze email from M. Power re confidentiality agreement (.1) and correspond with T. Meerovich re same (.1).
08/12/22	G. Miller	0.10	77.00	B110	Call with FTI, KCC and FGMC re preparation of schedules and statements.
08/12/22	T. Moyron	0.20	158.00	B110	Correspond with T. Cairns and FTI re bar date motion.

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08/12/22	T. Moyron	0.30	237.00	B110	Analyze email from T. Meerovich re confidentiality agreement (.1); exchange emails with M. Hyland re same (.1); and prepare email to Committee counsel re signature (.1).
08/14/22	D. Cook	1.10	682.00	B110	Draft form of comprehensive chapter 11 case workstream monitor (.9); analysis concerning tasks to be added to monitor with respect to same (.2).
08/15/22	S. Maizel	1.00	970.00	B110	Drafting email to US Dept. of Justice and Ginnie Mae responding to demand for information on bankruptcy process.
08/15/22	D. Cook	5.50	3,410.00	B110	Draft comprehensive chapter 11 case workstream monitor (2.5); analysis with respect to administrative task matters with respect to same (.6); analysis with respect to financing task matters with respect to same (.3); analysis with respect to retention task matters with respect to same (.2); analysis with respect to employment task matters with respect to same (.3); analysis with respect to sale task matters with respect to same (.3); analysis with respect to agency task matters with respect to same (.4); analysis with respect to warehouse lender task matters with respect to same (.4); analysis with respect to plan/DS task matters with respect to same (.2); analysis with respect to transfer and termination notice task matters with respect to same (.3).
08/15/22	L. Macksoud	1.00	770.00	B110	Call with FTI and email with FGMC to discuss Multibank transfer issue (.2), review update from FGMC re sale of Customers' loans (.2), review draft order and stipulation between the debtors, the guarantors and Customers regarding account funds (.5) and draft email to guarantor counsel re same (.1).
08/15/22	G. Miller	0.40	308.00	B110	Call with FTI, KCC and FGMC re preparation of schedules and statements.
08/16/22	G. Miller	0.20	154.00	B110	Call with FTI, FGMC and KCC re preparation of schedules and statements.

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Date	Timekeeper	Hours	Amount	Task	Narrative
08/16/22	L. Macksoud	0.80	616.00	B110	Calls and emails with working group to discuss plan issues (.5), draft emails to counsel for Multibank re wire transfer issues (.3).
08/16/22	T. Moyron	0.60	474.00	B110	Conference call with T. Meerovich, M. Hyland, et al., re BRG document request and lifting of PEO.
08/16/22	S. Maizel	0.50	485.00	B110	Telephone conference with FTI re information requests from UCC financial advisors (.5).
08/17/22	T. Moyron	0.20	158.00	B110	Analyze email from M. Jacobson, et al., re Schedules/SOFA and Global Notes.
08/17/22	L. Macksoud	2.50	1,925.00	B110	Review LOI and draft resolution provided by Multibank (.4) and confer with J. John and M. Hyland re same (.3), call with Dentons and FTI working group to discuss asset sales and strategy (1.1), review BSI sale motion (.4) and call with T. Moyron and C. Montgomery to discuss ombudsman request from UST for same (.3).
08/17/22	S. Maizel	1.40	1,358.00	B110	Review and respond to email from US Trustee re personal information transfer under BSI transaction (1.0); telephone conference with T. Moyron, C. Montgomery, etc. re same (.4).
08/17/22	J. Murphy	0.50	522.50	B110	Attention to emails re Deutsche Bank pre-petition invoices.
08/17/22	G. Miller	1.50	1,155.00	B110	Review and research questions re schedules and statements of financial affairs (1.0); call with J. John and M. Jacobson re same (.5).
08/17/22	G. Miller	0.40	308.00	B110	Draft global note to schedules and statements re margin calls.
08/18/22	G. Miller	0.70	539.00	B110	Emails with J. John re questions concerning schedules and statements.
08/18/22	G. Miller	0.30	231.00	B110	Revise global note re margin calls.
08/18/22	G. Miller	0.30	231.00	B110	Call with FTI, KCC and FGMC re preparation of schedules and statements.
08/18/22	S. Maizel	0.10	97.00	B110	Review and respond to emails re agenda for upcoming hearing.

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Date	Timekeeper	Hours	Amount	Task	Narrative
08/18/22	S. Maizel	1.00	970.00	B110	Review materials related to potential discharge of FCA claims.
08/18/22	L. Macksoud	7.00	5,390.00	B110	Further review Multibank MFSTA (.3) and draft email to Multibank counsel re same and re bankruptcy court authority (.2), confer with FGMC re same and re next steps on Multibank wire issue (.2), call with C. Montgomery to review Cash Flow DIP Lender comments to plan and disclosure statement and further update same (5.0), call with G. Miller and FTI re Deutsche Bank fee issue (.4); call with PSJZ and Dentons working group to discuss plan construct (.9).
08/18/22	T. Moyron	0.40	316.00	B110	Analyze emails from M. Jacobson, et al., re Schedules/SOFA and global notes.
08/19/22	T. Moyron	0.30	237.00	B110	Conference call with S. Maizel regarding pending issues, including FNMA and reorganization transaction costs.
08/19/22	T. Moyron	0.80	632.00	B110	Teams meeting with M. Jacobson re Schedules/SOFA (.4); analyze matters related to Global Notes (.2); correspond with M. Jacobson, et al., re Global Notes (.2).
08/19/22	G. Miller	0.40	308.00	B110	Call with FTI, KCC and FGMC re preparation of schedules and statements.
08/19/22	G. Miller	1.30	1,001.00	B110	Review and revise global notes re schedules and statements.
08/21/22	G. Miller	0.20	154.00	B110	Email J. John re questions concerning schedules and statements.
08/22/22	G. Miller	0.80	616.00	B110	Review draft statements of financial affairs.
08/22/22	G. Miller	0.60	462.00	B110	Call with A. Samples and M. Jacobson re draft statements of financial affairs.
08/22/22	G. Miller	0.50	385.00	B110	Call with FGMC, FTI and KCC re preparation of schedules and statements.
08/23/22	G. Miller	0.30	231.00	B110	Call with FTI, KCC and FGMC re preparation of schedules and statements.
08/23/22	G. Miller	0.30	231.00	B110	Revise global notes re schedules and statements.

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Date	Timekeeper	Hours	Amount	Task	Narrative
08/23/22	G. Miller	0.30	231.00	B110	Call with M.Jacobson and J.John re global notes.
08/23/22	T. Moyron	0.20	158.00	B110	Bravo/FGMC call regarding MSFTA.
08/23/22	T. Moyron	0.20	158.00	B110	Analyze J. McKay, et al., emails re Schedules/SOFA.
08/23/22	T. Moyron	0.80	632.00	B110	Analyze Schedules/SOFA and related matters.
08/23/22	C. Montgomery	0.10	121.00	B110	Communications with T. Moyron regarding revisions to schedules.
08/24/22	C. Montgomery	1.80	2,178.00	B110	Review draft schedules.
08/24/22	T. Moyron	0.20	158.00	B110	Correspond with A. Samples re Committee request.
08/24/22	T. Moyron	0.80	632.00	B110	Participate in FGMC catch-up call regarding FNMA, plan, and other matters.
08/24/22	T. Moyron	0.20	158.00	B110	Call with D. Oien regarding plan and other updates.
08/24/22	G. Miller	0.30	231.00	B110	Call with FTI, KCC and FGMC re preparation of schedules and statements.
08/24/22	G. Miller	0.60	462.00	B110	Call with A.Samples, D. Oien, M. Jacobson, J. John re draft schedules.
08/24/22	S. Maizel	0.50	485.00	B110	Zoom conference with D. Oien, J. Jones, S. Schrag, etc. re pending legal issues.
08/25/22	T. Moyron	0.60	474.00	B110	Correspond with KCC re Schedules/SOFA (.1); analyze M. Jacobsen, et al., regarding Schedules/SOFA (.2); analyze matters related to Schedules/SOFA (.3).
08/25/22	S. Maizel	0.40	388.00	B110	Zoom conference with S. Schrag, L. Smith, etc. re pending issues.
08/25/22	S. Maizel	1.00	970.00	B110	Review and respond to emails re preparation of schedules and SOFA.
08/26/22	T. Moyron	0.80	632.00	B110	Call with T. Meerovich, M. Jacobson, et al., regarding Schedules/SOFA.
08/26/22	T. Moyron	0.50	395.00	B110	Teams meeting regarding Schedules/SOFA with M. Jacobson, A. Samples, T. Meerovich, S. Maizel, et al.
08/26/22	T. Moyron	0.40	316.00	B110	Analyze emails from T. Meerovich, et al., re Schedules/SOFA.

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Date	Timekeeper	Hours	Amount	Task	Narrative
08/26/22	S. Maizel	3.00	2,910.00	B110	Zoom conference with FTI, etc. re preparation of schedules/SOFA (1.0); zoom conference with FTI, A. Samples, J. Johns, etc. re schedules and SOFA (2.0).
08/26/22	S. Maizel	0.20	194.00	B110	Telephone conference with T. Moyron re pending issues.
08/26/22	K.M. Howard	0.10	34.00	B110	Email exchanges with T. Moyron and S. Maizel regarding materials needed for upcoming hearings.
08/26/22	C. Montgomery	0.30	363.00	B110	Draft communications with T. Moyron regarding schedules.
08/26/22	G. Miller	1.00	770.00	B110	Call with T. Merrovich, M. Jacobson and T. Moyron re Rushmore and Schedules.
08/26/22	G. Miller	0.80	616.00	B110	Review correspondence re AMC loan repurchase issue and email FTI re same (.6); Call with C. Montgomery re same (.2).
08/26/22	G. Miller	1.90	1,463.00	B110	Call with M. Jacobson, T. Meerovich, T. Moyron, S. Maizel, A.Samples re schedules.
08/26/22	T. Moyron	0.70	553.00	B110	Analyze matters related to Schedules/SOFA (.6); call with M. Jacobson re same (.1).
08/26/22	C. Doherty, Jr.	0.10	69.50	B110	Review Critical Dates memorandum.
08/26/22	S. Alberts	0.40	396.00	B110	Communicate with co-counsel about status of KERP releases (.2) and follow up (.2).
08/29/22	T. Moyron	1.90	1,501.00	B110	Analyze Schedules/SOFA (.9); correspond with M. Jacobson and G. Miller re same (.4); analyze A. Samples, et al., emails re same (.6).
08/29/22	T. Moyron	0.20	158.00	B110	Correspond with E. Howe re Schedules/SOFA.
08/29/22	S. Maizel	0.30	291.00	B110	Zoom conference call with M. Schwarzmman, etc. re schedules issues.
08/29/22	S. Maizel	1.00	970.00	B110	Drafting weekly report of legal activities to Ginnie Mae and Counsel at US Dept. of Justice.
08/29/22	S. Maizel	0.30	291.00	B110	Zoom call with D. Oien, J. Jones, etc. re recurring legal issues.
08/29/22	C. Montgomery	0.50	605.00	B110	Review Schedules/SOFA.

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Date	Timekeeper	Hours	Amount	Task	Narrative
08/29/22	G. Miller	1.70	1,309.00	B110	Review schedules and statements.
08/29/22	T. Moyron	0.40	316.00	B110	Correspond with M. Jacobson, C. Montgomery, et al., re Schedules/SOFA.
	Subtotal	148.40	118,550.50		

B120 - Asset Analysis and Recovery

Date	Timekeeper	Hours	Amount	Task	Narrative
08/01/22	S. Schrag	0.10	65.00	B120	Participate in reoccurring call with J. John and T. Moyron to discuss Committee and prepetition payments.
08/01/22	G. Miller	0.50	385.00	B120	Emails with T. Moyron, A. Samples and O .Alaniz re Freddie Mac term sheet.
08/01/22	G. Miller	1.10	847.00	B120	Review Freddie Mac Servicing Assurances Stipulation and Schedule 1 thereto (.6); Emails with C. Montgomery and L. Smith re same (.5).
08/02/22	G. Miller	1.60	1,232.00	B120	Analyze and redact letter of intent re purchase of MSR in preparation of circulating to Freddie Mac.
08/03/22	G. Miller	1.00	770.00	B120	Mark redactions to LOI for purchase of MSR (.6); Emails with FGMC re circulation of same to Freddie Mac (.4).
08/03/22	G. Miller	0.50	385.00	B120	Follow up with C. Montgomery and L. Smith re Freddie Mac servicing assurances stipulation.
08/04/22	G. Miller	1.60	1,232.00	B120	Draft motion to approve Freddie Mac settlement.
08/04/22	G. Miller	0.40	308.00	B120	Call with T. Moyron, C. Montgomery, L. Smith and Fannie Mae re loan purchase.
08/04/22	G. Miller	0.10	77.00	B120	Revise Freddie Mac Term Sheet and email P. Moak re same.
08/04/22	G. Miller	0.90	693.00	B120	Review and comment re draft board presentation on BSI MSR sale.
08/04/22	G. Miller	0.40	308.00	B120	Call with P. Moak, O. Alaniz, T. Moyron and C. Montgomery re Freddie Mac Term Sheet.
08/05/22	G. Miller	2.10	1,617.00	B120	Revise motion to approve Freddie Mac settlement.

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Date	Timekeeper	Hours	Amount	Task	Narrative
08/08/22	G. Miller	2.60	2,002.00	B120	Draft Fannie Mae term sheet.
08/08/22	G. Miller	0.80	616.00	B120	Call with T. Moyron, C. Montgomery, L. Smith, S. Maizel, L. Macksoud, and J. Murphy re Freddie Mac and Fannie Mae settlements.
08/08/22	G. Miller	1.00	770.00	B120	Review and revise Fannie Mac servicing assurances stipulation and schedule.
08/09/22	G. Miller	1.90	1,463.00	B120	Revise draft motion to approve Freddie Mac settlement.
08/09/22	G. Miller	0.20	154.00	B120	Emails with T. Moyron and A. Samples re Fannie Mae term sheet and servicing assurances stipulation.
08/09/22	G. Miller	0.80	616.00	B120	Revise Fannie Mae term sheet.
08/09/22	G. Miller	0.30	231.00	B120	Call with T. Moyron, P. Moak and O. Alaniz re Freddie Mac term sheet.
08/10/22	G. Miller	4.00	3,080.00	B120	Revise motion to approve Freddie Mac settlement.
08/10/22	G. Miller	1.10	847.00	B120	Draft proposed order approving Freddie Mac settlement.
08/10/22	G. Miller	0.70	539.00	B120	Review Freddie Mac revisions to term sheet and servicing assurances stipulation.
08/11/22	G. Miller	1.90	1,463.00	B120	Draft declaration in support of motion to approve Freddie Mac settlement.
08/11/22	G. Miller	0.80	616.00	B120	Call with FGMC and FTI to discuss Freddie Mac Term Sheet.
08/11/22	G. Miller	0.40	308.00	B120	Call with T. Moyron, C. Montgomery and S. Maizel re Freddie Mac Term Sheet.
08/11/22	G. Miller	0.60	462.00	B120	Draft motion to approve Fannie Mae settlement.
08/11/22	G. Miller	0.40	308.00	B120	Call with O. Alaniz, T. Moyron, C. Montgomery and L. Smith re Freddie Mac Term Sheet.
08/11/22	G. Miller	1.10	847.00	B120	Revise draft motion to approve Freddie Mac settlement.
08/12/22	G. Miller	1.60	1,232.00	B120	Revise draft motion to approve Freddie Mac settlement.
08/12/22	G. Miller	0.30	231.00	B120	Review Freddie Mac revisions to draft motion to approve settlement.

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Date	Timekeeper	Hours	Amount	Task	Narrative
08/12/22	G. Miller	1.90	1,463.00	B120	Call with T. Moyron, S. Maizel, C.Montgomery, C.O'Leary and L.Smith re revisions to motion to approve Freddie Mac settlement.
08/12/22	G. Miller	0.70	539.00	B120	Revise declaration in support of motion to approve Freddie Mac settlement.
08/12/22	G. Miller	0.40	308.00	B120	Call with O. Alaniz, S. Maizel, C. Montgomery and T. Moyron re Freddie Mac term sheet.
08/14/22	G. Miller	0.30	231.00	B120	Review comments to Freddie Mac term sheet.
08/14/22	G. Miller	0.80	616.00	B120	Call with S. Maizel, C. Montgomery, L. Smith, and T. Moyron re cash flow DIP lender questions re Fannie Mae and Freddie Mac term sheet.
08/15/22	G. Miller	0.40	308.00	B120	Review draft Freddie Mac notice of adequate assurances stipulation (.2); Emails with T.Cairns and T.Moyron re same (.2).
08/15/22	G. Miller	3.50	2,695.00	B120	Revise Freddie Mac motion to approve settlement and related declaration and term sheet.
08/15/22	G. Miller	0.60	462.00	B120	Call with O.Alaniz, T. Moyron, S.Maizel and T. Cairns re proposed order approving Freddie Mac settlement agreement.
08/15/22	G. Miller	0.90	693.00	B120	Draft motion to shorten time re motion to approve Freddie Mac settlement.
08/15/22	G. Miller	0.60	462.00	B120	Call with T. Moyron, C. Montgomery, S. Maizel, L. Harrison and L. Smith re finalizing Freddie Mac term sheet and motion to approve settlement and BSI sale motion.
08/15/22	G. Miller	1.20	924.00	B120	Review Freddie Mac comments to draft term sheet, motion to approve settlement and motion to approve sale of MSRs.
08/16/22	G. Miller	1.90	1,463.00	B120	Finalize motion to approve Freddie Mac settlement (1.5); Call with C. Montgomery re same (.4).
08/16/22	G. Miller	0.30	231.00	B120	Review and revise motion to approve Freddie Mac servicing assurances stipulation.

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Date	Timekeeper	Hours	Amount	Task	Narrative
08/16/22	G. Miller	0.60	462.00	B120	Revise draft declaration in support of motion to approve Freddie Mac settlement.
08/16/22	G. Miller	0.60	462.00	B120	Call with O. Alaniz, P. Moak, and T.Moyron to discuss issues re Freddie Mac settlement.
08/16/22	D. Cook	0.90	558.00	B120	Draft notice of revised form of order with respect to BSI Sale (.8); analysis of Debtor team emails with respect to filing of same (.1).
08/16/22	T. Moyron	0.30	237.00	B120	Correspond with O. Alaniz re agreements with Freddie Mac and related documents.
08/17/22	D. Cook	0.10	62.00	B120	Email correspondence with L. Harrison regarding notice of revised form of order with respect to BSI Sale.
08/17/22	G. Miller	2.10	1,617.00	B120	Finalize motion to approve Freddie Mac settlement and related pleadings.
08/17/22	G. Miller	0.60	462.00	B120	Revise motion to shorten time re motion to approve Freddie Mac settlement.
08/22/22	G. Miller	0.30	231.00	B120	Emails with J. John, G. Reyes and D.Oien re REO property.
08/26/22	G. Miller	0.40	308.00	B120	Review revised Fannie Mae settlement term sheet.
08/27/22	G. Miller	0.60	462.00	B120	Review revised Fannie Mae settlement term sheet.
08/27/22	G. Miller	4.40	3,388.00	B120	Draft motion to approve Fannie Mae settlement, motion to shorten notice and related declaration.
08/28/22	G. Miller	0.30	231.00	B120	Draft motion to approve Fannie Mae settlement, motion to shorten notice and related declaration.
08/29/22	G. Miller	3.80	2,926.00	B120	Revise motion to approve Fannie Mae settlement and related motion to shorten time.
08/30/22	G. Miller	0.40	308.00	B120	Review draft motion to approve servicing assurances stipulation with Fannie Mae and emails with T.Moyron and D.Cook re same.
08/30/22	G. Miller	0.40	308.00	B120	Review correspondence re revisions to order approving Freddie Mac settlement.

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Date	Timekeeper	Hours	Amount	Task	Narrative
08/30/22	G. Miller	1.10	847.00	B120	Call with T.Moyron, S.Maizel, C.Montgomery and L.Harrison re issues concerning BSI sale, Freddie Mac settlement and Fannie Mae settlement.
08/30/22	G. Miller	0.30	231.00	B120	Review limited objection of Freddie Mac to BSI sale and email T.Moyron re same.
08/31/22	G. Miller	0.80	616.00	B120	Attend hearing re motion to approve BSI sale and motion to approve Freddie Mac settlement.
08/31/22	G. Medina	0.70	252.00	B120	Research per the request of C. Montgomery PIMPCO UCC filing after Bridge Loan (0.5); correspond with C. Montgomery and send results (0.2).
Subtotal		63.00	48,067.00		

B130 - Asset Disposition

Date	Timekeeper	Hours	Amount	Task	Narrative
07/27/22	T. Moyron	0.40	316.00	B130	Analyze BSI proposed sale matters.
08/01/22	C. Montgomery	0.10	121.00	B130	Communications with G. Miller and T. Moyron regarding BSI letter of intent (.1).
08/01/22	L. Harrison	2.70	3,078.00	B130	Attend to review and revisions to MSR sale motion (2.00); review of latest MSR sale process tracker (.30); review latest draft of BSI LOI (.40).
08/01/22	E. Smith	0.20	205.00	B130	Prepared revised draft of MSR purchase LOI.
08/01/22	E. Smith	1.80	1,845.00	B130	Reviewed comments on draft of MSR LOI and revised draft.

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08/02/22	L. Harrison	4.80	5,472.00	B130	Review email from J. Krasne of FTI regarding status of MSR motion (.10); respond to email from J. Krasne regarding status (.20); review latest draft of motion (.40); forward motion to J. Krasne (.30); review executed version of BSI LOI against previous drafts for comments per suggestion of T. Moyron (.80); review comments from L. Smith, C. O'Leary and G. Miller regarding executed BSI LOI and related matters (.30); collate high level comments for circulation to Dentons team (.60); forward comments to Dentons team with commentary (.40); attend to conference call with T. Meerovich, W. Nolan, D. Oien, A. Samples, L. Smith, S. Maizel, L. Macksoud and T. Moyron regarding MSR sale status, EBOs and follow up with agencies (.80) further attention to draft motion, declaration and order for sale of MSRs (.90).
08/02/22	E. Smith	1.30	1,332.50	B130	Reviewed final executed MSR sale LOI and confer more broadly with FGMC, A. Samples and T. Ramm, FTI team, T. Meerovitch and Dentons team, T. Moyron, regarding asset sales.
08/02/22	E. Smith	1.70	1,742.50	B130	Reviewed executed LOI for MSR sale and prepared summary of review for FGMC team (.4); confer with T. Moyron, C. O'Leary and Geoff Miller regarding same and approach to counsel for Freddie Mac with redacted LOI (1.3).
08/02/22	T. Moyron	1.10	869.00	B130	Call with T. Meerovich, M. Hyland, S. Maizel, et al., regarding asset sale strategy.
08/02/22	C. Montgomery	0.40	484.00	B130	Review BSI letter of intent regarding BSI and communications with C. O'Leary, L. Smith and L. Harrison regarding same.
08/02/22	S. Maizel	1.10	1,067.00	B130	Zoom conference with T. Meerovich, T. Moyron, etc. re asset sale strategy, etc.
08/03/22	T. Moyron	0.60	474.00	B130	Telephone conference with T. Meerovich and S. Maizel re asset dispositions.
08/03/22	T. Moyron	0.60	474.00	B130	Zoom call with T. Meerovich, C. Montgomery, et al., re disposition of various sale proceeds.
08/03/22	C. Montgomery	0.10	121.00	B130	Communications with G. Miller regarding BSI letter of intent (.1).
08/03/22	S. Maizel	0.60	582.00	B130	Telephone conference with T. Meerovich and T. Moyron re asset dispositions.

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08/03/22	S. Maizel	0.60	582.00	B130	Zoom call with T. Meerovich, C. Montgomery, etc. etc. re disposition of various sale proceeds.
08/03/22	E. Smith	1.60	1,640.00	B130	Reviewed excess asset sale proceeds application communication, warehouse provider repo agreement, working capital loan agreement and credit support for those obligations.
08/03/22	L. Harrison	0.90	1,026.00	B130	Attend to clean up edits to motion (.40); attend to edits to order (.20); attend to edits to declaration regarding MSR sale motion (.30).
08/03/22	T. Moyron	0.60	474.00	B130	Analyze and correspond with D. Oien, et al., regarding LOI, redaction, etc. (.3); prepare email to M. Schmergel at DOJ re same (.1); correspond with O. Alaniz re Freddie Mac (.2).
08/04/22	L. Harrison	4.00	4,560.00	B130	Review draft deck for board regarding outlining BSI MSR transaction (.70); follow up with T. Moyron regarding comments (.20); attend to conference call with FTI and internal Dentons team regarding BSI and other related sale transactions (1.00); attend to updates to Meerovich declaration in light of latest information from FTI deck (.50); continue with review of draft deck for updating of MSR motion and order (1.60).
08/04/22	S. Maizel	0.50	485.00	B130	Zoom conference re sale strategy.
08/04/22	T. Moyron	0.70	553.00	B130	Call with counsel for Freddie Mac, including O. Alaniz, P. Moak, G. Miller, et al., re status and various documents.
08/04/22	T. Moyron	0.50	395.00	B130	Participate in Teams Meeting with FTI, FGMC, including T. Meerovich, A. Samples, et al., regarding sale transaction deck.
08/04/22	T. Moyron	1.20	948.00	B130	Correspond with A. Samples re overpayment and related labor considerations (.2); correspond with S. Maizel and S. McCandless re same (.3); review analysis and next steps (.2); calls with S. Maizel (.2); and M. Jacobson regarding same (.2); conference call with A. Samples, et al., re same (.1).
08/04/22	T. Moyron	0.40	316.00	B130	Teams Meeting regarding MSR Sale Transaction Deck.

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08/04/22	C. Montgomery	2.60	3,146.00	B130	Review FTI MSR sale transaction deck (.2); participate in FTI - management Teams call regarding BSI sale (.6); participate in Teams call including T. Meerovich, T. Moyron, L. Harrison and others re platform sale process (1.0); Zoom call with S. Warren, J. Taylor, T. Moyron, L. Smith regarding Fannie settlement discussions (.4); participate in Zoom call with P. Moak, O. Alaniz, G. Miller, and T. Moyron regarding the settlement and MSR sale Letter of intent (.4).
08/05/22	L. Harrison	4.90	5,586.00	B130	Review various emails regarding scheduling call to discuss MSR sale status with local counsel (.10); forward latest draft of MSR motion to L. Davis per T. Moyron's request (.30); attend to conference call with T. Moyron, S. Maizel, L. Davis, T. Ramm, D. Oien, and L. Smith regarding status of MSR sale, timing, and related matters (1.00); review course of action regarding finalizing pleadings for possible filing next week (.40); confer with T. Moyron regarding circulating pleadings to Dentons team for comments (.20); review latest draft of Meerovich declaration (.70); forward same to FTI per T. Moyron's direction (.20); attend to review of draft motion and order regarding MSR sale in preparation for changes in light of conference call with client and accelerated timing (1.50); cursory review of motion to lift stay by Flagstar (.30); review emails regarding notice of liquidation from TCB (.20).
08/05/22	E. Smith	0.50	512.50	B130	Confer with FGMC, D. Oien, Pachulski firm, L. Davis Jones, and Dentons team, T. Moyron, regarding MSR sale timing and process.
08/05/22	T. Moyron	2.60	2,054.00	B130	Correspond with L. Harrison, et al., regarding MSR Motion, timing, scheduling related thereto, etc. (.4); conference call with L. Harrison, S. Maizel, L. Davis, T. Ramm, D. Oien, and L. Smith regarding status of MSR sale, timing, and related matters (1.0); correspond with L. Harrison re comments and motion (.2); review latest draft of Meerovich declaration (.3); analyze draft motion and order re MSR sale (.7).
08/05/22	T. Moyron	0.20	158.00	B130	Analyze unredacted BSI LOI (.2).
08/06/22	L. Harrison	1.50	1,710.00	B130	Attend to draft proposed order for MSR sale (.80); revisit timing of MSR sale for key dates to support emergency relief (.70).
08/08/22	S. Maizel	0.10	97.00	B130	Zoom call with T. Moyron re sale of loans to Freddie Mac.

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Date	Timekeeper	Hours	Amount	Task	Narrative
08/08/22	L. Harrison	3.50	3,990.00	B130	Attend to revisions to motion and order regarding MSR sale (2.50); circulate same to internal team with follow up requests noted (.30); review comments to MSR sale motion and order from L. Macksoud (.40); review comments to MSR sale motion from C. O'Leary (.30).
08/08/22	T. Moyron	0.30	237.00	B130	Analyze MSR sale motion open questions (.2) and prepare email to L. Jones, et al., attaching draft sale motion (.1).
08/08/22	C. Montgomery	0.40	484.00	B130	Communications with L. Macksoud and L. Harrison regarding BSI sale pleadings (.1); review N. Sombuntham draft BSI Presentation (.3).
08/09/22	S. Schrag	1.00	650.00	B130	Confer with J. John regarding motion to return payments made in error under loans (.2); confer with L. Smith, Julie John, Darien Oien, and Suzy Lindblom, Laurie Sullivan, Alycia Goldsmith, and Crystal Reeves regarding details on the same (.5); confer with S. Maizel, T. Moyron, T. Cairns, T. Meerovich, and MA Kaptain regarding the same (.3).
08/09/22	L. Macksoud	0.50	385.00	B130	Review and comment on draft motion and order approving MSR sales (.5).
08/09/22	L. Macksoud	4.60	3,542.00	B130	Confer with T. Moyron and local counsel re hearing agenda relating to Flagstar's motion to lift stay (.3), confer with D. Cook re draft response to same (.2), review and revise draft (.2), emails with Flagstar's counsel re extension of objection deadline (.1), call with Flagstar counsel and business team to discuss consensual resolution to motion (.6), review Freddie Reservation of Rights relating to same (.2), draft and revise order granting relief from stay (.8) and confer with T. Moyron and T. Ram re same (.6), draft email to Flagstar's counsel with proposed order (.1), call with H. Overcash and D. Kaur re research relating to section 525 of the bankruptcy code (.2), call with Fannie Mae to discuss various stipulations and accounting issue (.5), call with counsel to Freddie regarding comments to stip (.3), respond to questions from FTI and company re release of funds and movement of funds through certain accounts (.5).
08/09/22	C. Montgomery	0.10	121.00	B130	Communications with T. Moyron and L. Harrison regarding BSI sale order motion (.1).

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08/09/22	T. Moyron	0.20	158.00	B130	Analyze email from J. Krasne regarding MSR transaction overview deck and respond to same (.1); analyze same (.1).
08/09/22	T. Moyron	0.10	79.00	B130	Analyze matters related to FGMC's request re scratch and dent loans.
08/09/22	L. Harrison	5.70	6,498.00	B130	Attend to folding in comments to motion and order from L. Macksoud and C. O'Leary (.80); attend to further revisions to motion (.60); forward draft MSR motion to N. Peterman at GT (.20); review latest version of draft board deck from FTI regarding MSR sale (.30); attend to further revisions to motion regarding BSI relations with FGMC, purchase price calculations, free and clear analysis and related matters (3.00); review various emails regarding sharing of LOI with Freddie Mac, status of MSR sale agreement and related matters (.40); follow up with T. Moyron regarding status of Meerovich declaration and comments to FTI deck for board (.40).
08/10/22	S. Franco	0.70	938.00	B130	Review letter of intent for MSR sale.
08/10/22	S. Franco	2.90	3,886.00	B130	Review BSI's form of MSR purchase and sale agreement and initial comments from FGMC to agreement.
08/10/22	S. Franco	1.40	1,876.00	B130	Prepare comments to BSI's form MSR purchase and sale agreement and provide to Dentons team for review.
08/10/22	S. Franco	0.50	670.00	B130	Conference call with T. Moyron, C. O'Leary, L. Harrison, J. Murphy and L. Smith to discuss comments to BSI's form MSR purchase and sale agreement.
08/10/22	E. Smith	1.90	1,947.50	B130	Attended MSR purchase and sale agreement review with Dentons team, T. Moyron, S. Franco, C. O'Leary, J. Murphy and Lynn Harrison (.4); reviewed PSA mark ups and communicated with FGMC subservicer regarding preparation for interim servicing period (1.5).
08/10/22	E. Smith	0.80	820.00	B130	Attended asset sale planning call with FGMC, A. Samples and T. Ramm, FTI, T. Meerovich, and Dentons, T. Moyron and S. Maizel.
08/10/22	S. Maizel	0.20	194.00	B130	Zoom conference with T. Meerovich, T. Moyron, etc. re BSI sale issues.
08/10/22	S. Maizel	0.90	873.00	B130	Zoom conference with A. Samples, D. Oien, T. Moyron, etc. re asset sales issues, etc.

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08/10/22	T. Moyron	0.20	158.00	B130	Analyze emails from J. Krasne, et al., re BSI Deck.
08/10/22	T. Moyron	0.30	237.00	B130	Prepare emails to L. Harrison, et al., re BSI sale.
08/10/22	T. Moyron	0.20	158.00	B130	Analyze proposed comments to BSI deck.
08/10/22	T. Moyron	0.90	711.00	B130	Analyze proposed changes to MSR PSA (.6); and analyze correspondence from S. Franco, et al., re same (.3).
08/10/22	C. Montgomery	0.10	121.00	B130	Communications with G. Miller, L. Harrison regarding BSI sale (.1).

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Date	Timekeeper	Hours	Amount	Task	Narrative
08/10/22	L. Harrison	10.90	12,426.00	B130	Review several emails from T. Moyron re BSI sale agreement and status of pleadings (.30); reply to each email from T. Moyron (.10); follow up with J. Krasne re status of T. Meerovich Declaration (.20); confer with S. Schrag and D. Cook re cite checking MSR sale motion (.20); review latest board deck re MSR sale for collating comments to J. Krasne (.30); forward comments to deck to J. Krasne (.30); attend to review of initial draft of MSR sale agreement for bankruptcy related provisions and comments (.80); attend to collating first round of comments for circulation to C. O'Leary (.70); review comments from J. Murphy re board deck (.20); forward same to J. Krasne at FTI (.10); attend to brief conference call with T. Moyron, S. Maizel, C. O'Leary, L. Smith, A. Samples and T. Ramm re status of BSI sale agreement and future course of action (.30); further attention to collating additional comments to draft BSI Sale agreement, including review of relevant 363 provisions (.90); follow up with C. O'Leary re additional edits for BSI sale agreement (.40); review comments to sale agreement from S. Franco re bankruptcy issues (.40); confer with N. Sombuntham re edits to latest draft of board deck re MSR sale (.30); confer with C. O'Leary re confidentiality provisions to sale agreement (.30); confer with C. O'Leary re scheduling call with S. Franco to review comments to sale agreement (.10); attend to review of issues raised by D. Orien of FGMC re applicability of bulk transfer and Hart-Scott to MSR sale (.70); follow up with C. O'Leary, T. Moyron and S. Maizel re bulk transfer and Hart-Scott issues (.20); attend to conference call with T. Moyron, C. O'Leary, S. Maizel, S. Franco, and J. Murphy re comments to sale agreement and related matters (.60); confer with C. O'Leary re comments from T. Meerovich re declaration (.30); attend to revisions to Meerovich Declaration (1.30); review comments from S. Schrag re citations in motion (.30); attend to revisions to motion (.50); attend to revisions to sale order (.30); circulate drafts to L. Davis local counsel (.40); review latest draft of sale agreement with additional edits from FGMC (.30); follow up with L. Davis re local rule issues (.10) .
08/10/22	S. Schrag	3.90	2,535.00	B130	Confer with L. Harrison and D. Cook regarding cite check and shepardizing motion for authorizing sale (.2); review and revise motion authorizing sale (1.1); conduct research related thereto (2.6).

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08/10/22	T. Moyron	0.20	158.00	B130	Zoom conference with T. Meerovich, S. Maizel, et al., re BSI sale issues.
08/10/22	T. Moyron	0.90	711.00	B130	Zoom conference with A. Samples, D. Oien, S. Maizel, et al., re asset sales issues, etc.
08/11/22	G. Medina	0.80	288.00	B130	Follow-up call with D. Kaur regarding research and assisted her in answering additional questions related to notice terminating a contract and if FGMC can sell the Ginnie Mae authorization pursuant to section 363 of the Bankruptcy code.
08/11/22	L. Harrison	7.60	8,664.00	B130	Attend to additional edits to Meerovich Declaration (.70); circulate same to FTI and Dentons teams (.20); review latest version of board deck comparing same to current draft of BSI PSA (.60); follow up with N. Sombuntham regarding comments to deck (.30); attend to further revisions to motion with specific attention to chart describing sale terms and related matters (1.40); review email from N. Sombuntham regarding comments to board deck (.20); review comments from C. O'Leary regarding board deck (.20); update Declaration in light of recent emails regarding timing (.30); attend to review of comments from N. Sombuntham regarding sale motion (.60); attend to incorporating comments to sale motion (1.60); review emails from T. Moyron, C. Montgomery and G. Miller regarding language for Freddie Mac term sheet regarding sale (.40); attend to revising language (.30); circulate language with follow up regarding same (.40); circulate latest drafts of motion, declaration and order to FTI and Dentons team with follow up inquiries (.40).
08/11/22	E. Smith	0.50	512.50	B130	Review and prepare correspondence regarding analysis of GNMA barriers to loan pooling for Ginnie-supported securitization(s) (.2); reviewed summary of MSR sale transaction (.3).
08/11/22	T. Moyron	1.30	1,027.00	B130	Analyze MSR deck (.3); analyze updated MSR sale motion and documents (.6); analyze emails from N. Sombuntham, et al., regarding motion and declaration (.2); analyze emails from N. Sombuntham, et al., re MSR deck (.2).
08/11/22	S. Maizel	1.50	1,455.00	B130	Zoom conference re MSR sale motion and related issues with T. Moyron, C. Montgomery, etc. (1.0); review and respond to emails re MSR sale issues (.5).

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Date	Timekeeper	Hours	Amount	Task	Narrative
08/11/22	S. Maizel	1.00	970.00	B130	Telephone conference with counsel for Freddie Mac, T. Moyron re settlement and sale issues (.2); telephone conference with C. Montgomery, etc. re same (.3); analyze proposals are Freddie Mac settlement (.5).
08/11/22	T. Moyron	1.30	1,027.00	B130	Further correspondence with L. Harrison, L. Jones, et al., and analysis of draft motion, declarations, order re BSI.
08/12/22	T. Moyron	0.40	316.00	B130	Correspond with C. O'Leary, et al., re BSI sale.
08/12/22	T. Moyron	1.50	1,185.00	B130	Analyze updated sale motion and redline (.3); conference call with S. Maizel regarding sale motion and changes to same (1.1); prepare email to counsel for Freddie Mac re sale motion (.1).
08/12/22	T. Moyron	3.20	2,528.00	B130	Analyze MSR sale motion, updated sale motion and redline, and provide comments thereto (1.6); analyze Purchase and Sale Agreement and mechanics and inquiries related to Freddie and sale motion (1.2); correspond with L. Harrison (.3) and call with L. Harrison (.1) with respect to same.

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08/12/22	L. Harrison	12.40	14,136.00	B130	Attend to review of various emails regarding timing for filing motion (.20); review latest draft of sale agreement regarding timing issues (.30); follow up with T. Moyron regarding optimal time to file motion (.20); confer with C. O'Leary regarding timing for filing motion (.20); review latest draft of sale agreement for substantive changes (.40); review response to earlier questions from N. Sombuntham (.30); attend to revisions to sale motion in light of FTI comments (.30); attend to call regarding Freddie Mac issues with T. Moyron, S. Maizel, G. Miller, C. O'Leary and J. Murphy (.30); confer with T. Moyron and G. Miller regarding Freddie Mac related issues and sale motion (.40); per T. Moyron's request to update sale motion for distribution to BSI, Freddie Mac and others, attend to revisions to sale motion (.80); confer with T. Moyron regarding revising sale motion regarding Freddie Mac contract descriptions (.40); attend to drafting language for motion with C. O'Leary re Freddie Mac contracts (.80); review email from T. Moyron regarding revising motion to accommodate assumption and assignment issues (.30); attend to revising motion to address assignment and assumption issues (3.80); review email from local counsel regarding preparation of motion to shorten time (.30); confer with L. O'Leary regarding timing of sale motion to pass along to local counsel (.20); revisit revisions to sale motion (.60); circulate revised sale motion to internal Dentons team (.20); telephone conversation with T. Moyron regarding further edits to sale motion regarding assumption/assignment issues (.30); attend to further revisions to sale motion (1.20); review emails from T. Moyron and C. O'Leary regarding Freddie Mac, BSI and related issues (.40); review revised motion incorporating T. Moyron and S. Maizel comments (.30); follow up with T. Moyron regarding course of action regarding same (.20).
08/12/22	C. Montgomery	1.50	1,815.00	B130	Zoom call with O. Alaniz, T. Moyron and S. Maizel regarding BSI MSR sale and term sheet (.5); follow up Zoom with T. moyron and S. Maizel regarding same (.3); Zoom call with A. Samples, D. Oien, C. O'Leary, S. Maizel and T. Moyron regarding Freddie term sheet and BSI sale (.4); communications with L. Harrison regarding interim servicing agreement under BSI sale (.1); communications with T. Moyron regarding Freddie comments on Sale Motion (.1); review Freddie Term sheet response re BSI (.1).

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Date	Timekeeper	Hours	Amount	Task	Narrative
08/13/22	L. Harrison	4.00	4,560.00	B130	Review latest version of motion from T. Moyron (.40); proceed with revision to discussion portion of motion and related segments (1.00); attend to corresponding revisions to the Meerovich Declaration (.30); attend to corresponding revisions to the order and related matters (1.80); circulate draft language inserted to cover assumption and assignment to T. Moyron (.20); forward draft sale order to O. Alaniz of Reed Smith (.30).
08/14/22	L. Harrison	3.30	3,762.00	B130	Attend to revisions to Meerovich Declaration to address assumption and assignment related issues (.40); attend to revisions to the motion to shorten time from local counsel (.80); confer with T. Moyron and C. O'Leary regarding same (.40); confer with G. Miller regarding terminology issues regarding Freddie Mac settlement stipulation (.20); attend to further revisions to motion to shorten time adding segments regarding marketing and timing of sale (.70); review of latest draft of sale agreement (.80).
08/15/22	T. Moyron	0.10	79.00	B130	Prepare email to A. Sample re Freddie comment in sale motion.
08/15/22	T. Moyron	0.80	632.00	B130	Zoom meeting with L. Harrison, S. Maizel, et al., re finalization of MSR Sale documents and Freddie's comments to same.
08/15/22	T. Moyron	0.30	237.00	B130	Zoom meeting with M. Schmergel, et al., regarding BSI sale and related motions and timing.
08/15/22	T. Moyron	0.30	237.00	B130	Analyze D. Oien comments to motion to shorten (.1); analyze related emails from L. Harrison, et al., re same (.2).
08/15/22	T. Moyron	0.40	316.00	B130	Follow up zoom meeting with P. Omar, et al., regarding sale order and Freddie's proposed comments thereto.
08/15/22	T. Moyron	0.60	474.00	B130	Further analysis of Freddie Mac comments on sale motion.
08/15/22	T. Moyron	2.10	1,659.00	B130	Analyze updated sale motion, declaration and redlines (1.4); correspond with L. Harrison re same (.6); prepare email to P. Moak re same (.1).
08/15/22	T. Moyron	0.40	316.00	B130	Correspond with A. Samples, et al., regarding BSI sale and finalization of purchase agreement.

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08/15/22	T. Moyron	0.50	395.00	B130	Prepare email to Committee advisors regarding MSR sale (.1); and call with Committee advisors, T. Meerovich, et al., regarding MSR sale and Agency matters (.4).
08/15/22	T. Moyron	0.30	237.00	B130	Analyze correspondence from J. Dorchuck, et al., re BSI PSA.

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08/15/22	L. Harrison	14.80	16,872.00	B130	<p>Review email and attachments from O. Alaniz regarding Freddie Mac's comments to sale motion and related pleadings (.80); confer with T. Moyron regarding Freddie Mac's suggested changes (.20); review various emails from T. Moyron regarding motion to shorten notice period for sale motion (.20); attend to updating motion to shorten and order regarding same for forwarding to local counsel (.70); forward revised motion to shorten time to M. Caloway at PSZJ with some commentary (.20); forward revised motion to shorten time to D. Orien with some commentary (.30); review BSI comments to sale motion (.30); confer with C. O'Leary regarding same (.10); review additional comments from O. Alaniz regarding sale motion (.20); review email from B. Oppenheimer regarding comments to sale agreement (.20); review response to B. Oppenheimer email from C. O'Leary (.20); review comments from D. Orien regarding motion to shorten notice (.20); follow up with C. O'Leary regarding same (.20); preparation for internal call regarding BSI/Freddie Mac comments and related matters (.40); attend to call with T. Moyron, S. Maizel, and C. O'Leary regarding Freddie Mac's comments to latest draft of sale motion (.50); attend to revising sale motion (3.50); confer with G. Miller regarding coordinating motion language and dates (.20); confer with C. O'Leary regarding declaration edits (.20); circulate declaration to client representatives (.20); circulate revised sale motion to internal team (.30); review language from Freddie Mac attorneys regarding order (.30); incorporate same into draft order and conform balance of order (.60); follow up regarding cite checking motion (.20); attend to inputting revisions into draft declaration from D. Orien (.40); confer with C. O'Leary regarding including Freddie Mac issues in declaration (.30); follow up with T. Moyron regarding same (.20); follow up with T. Moyron regarding comparative edits to motion from Freddie Mac (.30); continue with edits to motion, including confirming case law, incorporation of edits from internal team members (2.50); confer with C. O'Leary regarding final version of sale agreement and comments to motion (.20); circulate final drafts of pleadings to T. Moyron for forwarding to local counsel (.40); follow up regarding motion shortening time and related matters with local counsel (.30).</p>

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08/15/22	S. Maizel	1.80	1,746.00	B130	Telephone conference with T. Moyron re sale of MSR to BSI (.2); telephone conference with C. Montgomery re same (.1); zoom conference with C. O'Leary, L. Harrison, etc. re same (.8); zoom conference with UCC counsel, etc. same (.4); telephone conference with T. Moyron, etc. re same (.3).
08/15/22	S. Maizel	0.50	485.00	B130	Zoom conference with Ginnie Mae counsel, etc. re sale of MSR to BSI (.3); telephone conference with L. Harrison and T. Moyron re same (.1); telephone conference with M. Schwarzmman, etc. re same (.1).
08/15/22	S. Maizel	1.50	1,455.00	B130	Review and respond to emails re motion to sell MSRs to BSI, including to Ginnie Mae, from FTI, etc. (1.0); revising motion re sale of MSRs to BSI (.5).
08/15/22	C. Montgomery	3.80	4,598.00	B130	Zoom call with T. Moyron and G. Miller regarding Fannie Mae Settlement Term Sheet and BSI sale (.5); communications with G. Miller regarding sale timing versus Fannie settlement timing (.5); participate in Zoom call with T. Meerovich, M. Schwarzman, N. Peterman, T. Moyron, C. O'Leary regarding agency settlements and BSI sale, including follow on call re Customers Bank security interest in loan sale proceeds (1.2); communications with T. Moyron, D Cooke and G. Miller re Freddie settlement motion and Possible separate adequate assurances motion (.8); zoom call with P. Moak, T. Moyron, S. Maizel and G. Miller regarding settlement and servicing assurances stipulation (.5); draft separate order language for Freddie services assurance stipulation (.3).
08/16/22	T. Moyron	0.20	158.00	B130	Call with C. Montgomery regarding Freddie comments on sale order and related issues.
08/16/22	T. Moyron	1.00	790.00	B130	Analyze proposed language from Freddie Mac re sale order (.4); analyze proposed changes and redlines (.3); correspond with L. Harrison, et al. re same (.3).
08/16/22	T. Moyron	0.80	632.00	B130	Analyze questions from B. Hackman at UST re BSI sale (.1); correspond with A. Samples, T. Ramm, T. Meerovich, et al., regarding responses (.4) and analyze related issues (.2); correspond with M. Caloway re responses to send to UST (.1).

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Date	Timekeeper	Hours	Amount	Task	Narrative
08/16/22	L. Harrison	6.20	7,068.00	B130	Review questions from UST regarding sale motion (.30); confer with C. O'Leary regarding same (.20); follow up with M. Caloway regarding same (.10); confer with C. O'Leary regarding gross purchase price (.20); review Freddie Mac language for inserting into sale order (.40); follow up with internal team regarding suspect provisions (.20); attend to revisions to responses to UST questions regarding sale motion (.50); review comments from team members regarding Freddie Mac insert for sale order (.40); attend to revising Freddie Mac language with combined comments (.80); circulate same to T. Moyron for forwarding to client (.30); review latest term sheet and order regarding Freddie Mac Settlement as it relates to the Sale Order (.40); attend to further revisions to sale order language from Freddie Mac (.20); review emails regarding language for Freddie Mac settlement term sheet (.40); follow up with T. Moyron regarding same (.10); review revised Freddie Mac insert for sale order (.40); review emails from client D. Orien and A. Samples regarding Freddie Mac insert (.30); review draft Freddie Mac insert for comments (.40); confer with T. Moyron regarding same (.30); attend to circulating comments internally regarding same (.30).
08/16/22	C. Montgomery	1.80	2,178.00	B130	Review Meerovich Declaration ISO BSI private sale (.1); review BSI sale motion as filed (.6); review Freddie sale motion order language and phone call with T. Moyron regarding same (.8); communications with S. Maizel regarding same and servicing guide (.3).
08/17/22	C. Montgomery	1.80	2,178.00	B130	Review reps and warranty language regarding NQM sale (.3); communications with T. Moyron and T. Ramm regarding same (.2); Zoom call with C. OLeary regarding same (.3); Zoom call with FTI, A. Samples, T. Ramm regarding asset sales (1.0).

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08/17/22	L. Harrison	6.40	7,296.00	B130	Review latest deck from N. Sombuntham regarding MSR sale for UCC (.40); review entry of order regarding time for sale motion (.20); review emails between G. Miller and M. Caloway regarding surety bond issue (.10); attend to final version of proposed Freddie Mac insert (.40); circulate draft insert to sale order for internal review (.20); review emails from T. Cairns regarding indemnification issues (.60); forward comments to latest deck regarding MSR sale for UCC (.30); attend to further revision to sale order incorporating Freddie Mac insert and conforming overall language regarding same (.70); forward revised proposed order to O. Alaniz (.20); review email from M. Caloway attaching inquiry from UST regarding "ombudsman" issues (.20); follow up regarding ombudsman issue with T. Moyron (.20); prepare revised proposed order for filing (.40); attend to conference call with C. Montgomery, T. Moyron, L. Macksoud and S. Maizel regarding ombudsman issues (.50); attend to revisions to notice of amended proposed order (.90); confer with T. Moyron regarding same (.30); follow up with M. Caloway regarding same (.50); forward revised proposed orders to M. Caloway (.30).
08/17/22	T. Moyron	0.60	474.00	B130	Teams Meeting with M. Power, M. Renzi, T. Meerovich, et al., regarding MSR sale.
08/17/22	T. Moyron	0.50	395.00	B130	Conference call with T. Ramm, A. Samples, et al., re MSRs (.3); follow up call with T. Ramm (.2).
08/17/22	T. Moyron	0.60	474.00	B130	Analyze MSR deck (.2); analyze proposed language to deck (.1); prepare email regarding same (.1); and analyze emails from N. Sombuntham re same (.2).
08/17/22	E. Smith	1.60	1,640.00	B130	Attended asset disposal strategy update with FTI, T. Meerovich, FGMC, A. Samples and T. Ramm, and Dentons team, T. Moyron (1.2); reviewed and prepared correspondence regarding GSE settlement discussions (C. Montgomery, C. O'Leary, T. Moyron (.4).
08/17/22	S. Maizel	1.00	970.00	B130	Zoom call with C. O'Leary and C. Montgomery re non-QM sale strategy (.3); telephone conference with A. Samples, T. Meerovich, etc. re strategy to sell assets.
08/17/22	T. Moyron	0.10	79.00	B130	Analyze email from M. Renzi re MSR sale documents.

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08/17/22	T. Moyron	0.30	237.00	B130	Analyze emails from B. Hackman regarding privacy policy and related inquiry (.1); correspond with M. Caloway re same (.1); analyze email from D. Oien re same (.1).
08/18/22	S. Maizel	0.50	485.00	B130	Review and respond to emails re UST inquiry re sale of personal information.
08/18/22	L. Harrison	1.70	1,938.00	B130	Review email from Fannie Mae counsel at O'Melveny regarding sale motion, order and related issues (.40); review email request from T. Moyron regarding response to issues raised by S. Warren regarding Fannie Mae (.20); attend to review of motion, declaration and sale agreement regarding responding to S. Warren email (.40); follow up with T. Moyron and C. O'Leary regarding same (.30); review email request for proposed order to be sent to S. Warren for Fannie Mae inserts (.10); follow up with M. Caloway regarding same (.30).
08/18/22	S. Maizel	0.30	291.00	B130	Telephone conference with M. Schwarzmann, N. Peterman, T. Meerovich, A. Samples, etc. re GSEs and Ginnie Mae issues, etc.
08/18/22	S. Maizel	0.80	776.00	B130	Telephone conference with L. Jones, T. Cairns, T. Moyron, etc. re plan.
08/18/22	C. Montgomery	0.10	121.00	B130	Review Fannie counsel comments regarding BSI sale order (.1).
08/18/22	T. Moyron	0.20	158.00	B130	Correspond with D. Oien, et al., re privacy concerns raised by UST.
08/19/22	T. Moyron	0.10	79.00	B130	Correspond with J. Krasne, et al., re asset call discussion.
08/19/22	T. Moyron	0.10	79.00	B130	Analyze email from L. Lerman, counsel to GNMA, and email to D. Oien re same.
08/19/22	T. Moyron	0.50	395.00	B130	Further analysis of materials re reorganization transaction (.3); and further correspondence with S. Maizel, et al., re same (.2).

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08/19/22	C. Montgomery	1.60	1,936.00	B130	Review S. Warren communications regarding MSR sale (.1); communications with C. O'Leary, T. Moyron, D. Oien and T. Ramm regarding NQM loan sales (.3); review communications with L. Lerman regarding Ginnie view of MSR timing (.1); Zoom asset sale strategy call with A. Samples, T. Meerovich, T. Moyron, T. Ramm (.8); communications with T. Moyron and C. O'Leary regarding TCB request for access to mortgage loans on bill of sale (.3).
08/19/22	E. Smith	0.90	922.50	B130	Attended asset sale strategy update with FGMC, A. Samples and T. Ramm, FTI, T. Meerovich, and Dentons team, T. Moyron and S. Maizel.
08/19/22	S. Maizel	0.30	291.00	B130	Telephone conference with T. Moyron re Fannie Mae issues.
08/19/22	S. Maizel	1.50	1,455.00	B130	Telephone conference with T. Meerovich, etc. re reorganization transaction considerations, etc. (.7); review and respond to emails re presentation for Board on reorganization transaction considerations (.8).
08/19/22	L. Harrison	0.50	570.00	B130	Follow up with M. Caloway regarding filed copy of notice of amended order (.20); attend to collating amended order and notice of filing for future reference (.30).
08/19/22	T. Moyron	0.70	553.00	B130	Teams meeting regarding asset sale strategy follow-up call with T. Meerovich, A. Samples, et al.
08/20/22	T. Moyron	0.20	158.00	B130	Correspond with J. Krane, et al., regarding First Guaranty Bank interest in purchasing assets.
08/20/22	T. Moyron	0.50	395.00	B130	Teams Meeting with Committee advisors including M. Indelicato, A. Samples, S. Maizel regarding GNMA and MSR sale.
08/20/22	S. Maizel	0.50	485.00	B130	Zoom conference with UCC counsel, etc., re MSR sale, Ginnie Mae, etc.
08/22/22	C. Montgomery	0.20	242.00	B130	Review Fannie Mae MSR servicing settlement agreement draft (.2).
08/22/22	T. Moyron	0.30	237.00	B130	Analyze email from S. Warren re sale order (.1); analyze issues related to proposed language by FNMA (.2).
08/22/22	T. Moyron	0.60	474.00	B130	Analyze email from A. Samples, et al., regarding GNMA (.2); analyze issues related to sale motion and PSA in connection therewith (.4).

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08/22/22	S. Maizel	0.30	291.00	B130	Zoom conference with C. Montgomery, etc. re Deutsche Bank issues.
08/22/22	L. Harrison	2.10	2,394.00	B130	Review emails regarding Fannie Mae comments to proposed sale order (.30); review comments by Fannie Mae to order (.40); follow up with C. Montgomery regarding same (.20); review emails regarding November 1 vs. October 2 transfer date for Ginnie Mae (.30); revisit motion regarding possibility of avoiding amending motion vs. amending agreement (.40); confer with T. Moyron regarding same (.20); review email from C. O'Leary regarding analysis of sale agreement and transfer date (.30).
08/22/22	E. Smith	2.30	2,357.50	B130	Reviewed revised draft of MSR sale order and correspondence from counsel to FNMA (.3); attended calls to discuss subservicer collection remittance allocations (1.6); reviewed revised draft of hedging agreement and confer with Chris O'Leary regarding same (.3).
08/23/22	E. Smith	0.70	717.50	B130	Attend call with FGMC, A. Samples, FTI, T. Meerovich, and Dentons team, T. Moyron, regarding GSE proposed settlement terms and loan sale strategy.
08/23/22	T. Moyron	0.60	474.00	B130	Call with M. Jacobson re timing of Schedules and SOFA (.1); analyze emails from M. Jacobson, A. Samples, et al. regarding Schedules and SOFA (.3); analyze emails from G. Miller, et al., re updated Global Notes (.2).
08/23/22	L. Harrison	3.40	3,876.00	B130	Follow up with T. Moyron regarding Fannie Mae comments with request for call to review same (.30); attend to review of Fannie Mae insert with track change comments in anticipation of internal call to review same (.70); attend to extensive call with T. Moyron, S. Maizel and C. Montgomery regarding Fannie Mae comments, status of settlement agreement with Fannie Mae and related matters (2.00); review course of action regarding revising order (.40).
08/23/22	T. Moyron	0.20	158.00	B130	Conference call with A. Samples re Non-QM Loans.
08/23/22	C. Montgomery	0.60	726.00	B130	Zoom call with T. Meerovich, A. Samples, T. Moyron and others regarding Fannie settlement impact on BSI sale (.6).

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08/23/22	C. Montgomery	3.10	3,751.00	B130	Communications with N. Sombuntham, T. Moyron and E.L. Smith regarding EBO analysis (.2); review Fannie Sale order modification proposal (.8); Zoom call with T. Moyron, S. Maizel and L. Harrison regarding Fannie settlement and order issues (2.1).
08/24/22	C. Montgomery	2.20	2,662.00	B130	Participate in call with M. Schwarzman, T. Meerovich, A. Samples, T. Moyron regarding Rams NQM loan sale (.7); phone call with C. O'Leary regarding Mass Mutual serving termination (.5); communications with C. O'Leary regarding Notice of transfer and termination for trust series (.1); review cash flow DIP credit agreement (.5); phone call with T. Ramm and t. Moyron regarding loan sale (.4).
08/24/22	S. Schrag	1.10	715.00	B130	Review correspondence from J. John regarding motion to sell at best execution rather than as scratch and dent loans (.3); confer with J. John regarding the same (.2); confer with T. Moyron, S. Maizel, L. Smith, T. Cairns, T. Meerovich, and MA Kaptain regarding the same (.2); confer with J. John and D. Oien during reoccurring call regarding additions to this motion regarding VA appraisals (.2); confer with T. Moyron, S. Maizel, and L. Smith regarding the same (.2).
08/24/22	T. Moyron	0.10	79.00	B130	Correspond with N. Peterman re call and potential banker.
08/24/22	T. Moyron	0.50	395.00	B130	Correspond with C. Montgomery re FNMA comments to draft sale order (.1); analyze redline and order (.4).
08/24/22	L. Harrison	1.90	2,166.00	B130	Attend to revisions to proposed sale order regarding Fannie Mae comments (1.30); circulate same to T. Moyron, S. Maizel and C. Montgomery (.30); review latest draft of proposed order from C. Montgomery with updated comments from Fannie Mae (.30).
08/24/22	E. Smith	1.20	1,230.00	B130	EBO loan sale agreement analysis and servicing collections remittance discussion with FTI, T. Meerovich, FGMC, T. Ramm, and Dentons team, T. Moyron (1.0); reviewed correspondence from S. Schrag regarding borrower cure motion (0.2).
08/24/22	T. Moyron	0.70	553.00	B130	Call with S. Warren regarding sale order and term sheet (.2); call with S. Warren, C. Montgomery and J. Taylor re sale order (.5).
08/24/22	T. Moyron	0.10	79.00	B130	Call T. Meerovich regarding pending issues, including Non-QM loans.

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08/24/22	T. Moyron	0.30	237.00	B130	Call with C. Montgomery re FNMA (.1); analyze proposed changes to sale order re FNMA (.2).
08/24/22	T. Moyron	0.50	395.00	B130	Call with A. Samples, et al., regarding Non-QM loans and sale related thereto.
08/25/22	L. Harrison	1.00	1,140.00	B130	Review latest emails between C. Montgomery and Fannie Mae and Freddie Mac with revised sale order (.30); monitor developments regarding resolution of potential objections to sale motion and follow up regarding same (.70).
08/25/22	S. Maizel	1.20	1,164.00	B130	Zoom conference with T. Moyron, etc. re asset disposition strategy (1.0); review and respond to emails re same (.2).
08/25/22	E. Smith	1.20	1,230.00	B130	Attended continuation of asset sale strategy update call with FGMC, T. Ramm, D. Oien, A. Samples, FTI, T. Meerovich, and Dentons team, T. Moyron.
08/25/22	T. Moyron	0.40	316.00	B130	Analyze sale framework for FGMC assets and scope related thereto, including licenses.
08/25/22	T. Moyron	1.10	869.00	B130	Participate in Asset sale strategy call with T. Meerovich, A. Samples, et al.
08/25/22	T. Moyron	0.60	474.00	B130	Analyze comments from FNMA on sale order and term sheet.
08/25/22	C. Montgomery	3.90	4,719.00	B130	Communications with T. Moyron, S. Warren J. Taylor regarding sale order language changes to accommodate Fannie Mae (.5); communications with A. Samples, D. Oien and T. Meerovich regarding same (.1); communications with N. Peterman and E. Howe regarding same (.1); communications with O. Alaniz and T. Moyron regarding sale order approval process (.1); communications with T. Meerovich and N. Peterman regarding Economic value of Fannie settlement and BSI sale (.1); communications with O. Alaniz and T. Moyron regarding BSI sale questions posed by Freddie Mac (.5); Teams call with C. O'Leary regarding Mass Mutual and advance recoveries (1.0); teams call with FTI regarding BSI sale strategy including T. Meerovich, A. Samples, T. Moyron (1.2); review Fannie Mae further comments to sale order and Communications with T. Moyron regarding same (.3).

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08/26/22	C. Montgomery	1.70	2,057.00	B130	Review Balbec LOI regarding NQM loan purchase (.3); communications with T. Moyron and E.L. Smith re same (.1); communications with T. Ramm regarding R&W list and Revision to LOI (.7); review Fannie Mae revisions to order (.6).
08/26/22	T. Moyron	0.20	158.00	B130	Call with L. Jones re pending issues and sale process and IB.
08/26/22	S. Maizel	0.70	679.00	B130	Zoom conference with SSG, etc. re sale of assets.
08/26/22	S. Maizel	0.20	194.00	B130	Telephone conference with T. Moyron re plan options.
08/26/22	E. Smith	0.40	410.00	B130	Reviewed and revised NQM loan purchase LOI (.3); reviewed and prepared correspondence with T. Moyron and C. Montgomery regarding NQM loan purchase LOI (.1).
08/26/22	T. Moyron	0.20	158.00	B130	Exchange emails with potential investment banker re meeting.
08/26/22	T. Moyron	0.70	553.00	B130	Zoom meeting with M. Power, M. Indelicato and C. Montgomery re BSI sale, Freddie agreement, FNMA, and other matters.
08/26/22	T. Moyron	0.10	79.00	B130	Conference call with T. Meerovich regarding potential sale.
08/26/22	T. Moyron	0.80	632.00	B130	Conference call with potential investment banker re sale matters.
08/27/22	C. Montgomery	0.10	121.00	B130	Review C. O'Leary communication regarding Mass Mutual.
08/28/22	L. Harrison	0.90	1,026.00	B130	Attend to review of language forwarded by Ginnie Mae for sale order (.40); attend to commenting regarding same (.30); confer with T. Moyron regarding same (.20).
08/28/22	S. Maizel	1.20	1,164.00	B130	Review and revise motion to shorten time re Fannie Mae settlement (.5); review and revise motion to approve Fannie Mae settlement (.7); analyze issue.
08/28/22	S. Maizel	2.20	2,134.00	B130	Telephone conference with T. Moyron re BSI sale issues (.1); telephone conference with C. Montgomery re same (.3); review and respond to emails from counsel for Freddie Mac re BSI sale issues (.3); analyze issues re Non-Bifurcated Liability (1.5).

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Date	Timekeeper	Hours	Amount	Task	Narrative
08/29/22	C. Montgomery	0.60	726.00	B130	Review Fannie Mae Term Sheet and communications with L. Harrison, S. Maizel, T. Moyron regarding latest iterations of Sale Order Inserts (.4); zoom call with FTI regarding BSI sale update (.2).
08/29/22	T. Moyron	0.70	553.00	B130	Conference call with L. Harrison, S. Maizel and C. Montgomery regarding sale order, hearing and related matters.
08/29/22	T. Moyron	0.50	395.00	B130	Correspond with L. Harrison, et al., regarding sale order (.3) and analyze related issues (.2).
08/29/22	S. Maizel	0.50	485.00	B130	Review and respond to emails from B. Hackman, UST, re order on BSI Sale Motion.
08/29/22	S. Maizel	0.80	776.00	B130	Review and respond to emails re UST issues with regard to the BSI Sale Order.
08/29/22	T. Moyron	3.30	2,607.00	B130	Analyze 9019 motion and prepare comments re FNMA (1.2); correspond with G. Miller, et al. re same (.7); analyze stipulation and schedule (.1); correspond with C. Montgomery re stipulation and status (.4); prepare emails to S. Warren re 9019 motion and settlement (.2); analyze FNMA term sheet (.3); prepare email to A. Samples, et al., and review response thereto (.2); analyze updated FTI analysis (.2).
08/29/22	L. Harrison	4.50	5,130.00	B130	Review latest revised language from Ginnie Mae counsel (.30); confer with C. Montgomery regarding lien and automatic stay language regarding same (.40); circulate list of open items for sale hearing and related matters to T. Moyron, S. Maizel and C. Montgomery for conference call (.30); attend to conference call with T. Moyron, S. Maizel and C. Montgomery regarding sale hearing and related matters (.70); review draft sale order from C. Montgomery (.40); insert language from Ginnie Mae and conform balance of sale order (1.70); circulate amended sale order to Greenberg Traurig (.50); follow up with L. Macksoud regarding JVB portfolio issues (.20).

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08/30/22	L. Harrison	13.70	15,618.00	B130	<p>Confer with T. Moyron regarding circulating latest drafts of sale order to Freddie Mac and Fannie Mae counsel and related matters (.50); forward latest draft of sale order to O. Alaniz and P. Moak (.40); forward latest draft of sale order to S. Warren (.40); attend to revisions of notice of second amended sale order in anticipation of filing revised sale order (.80); confer with P. Moak regarding Freddie Mac edits (.40); confer with S. Maizel regarding UST language regarding bulk sale/ombudsman issue (.40); insert new bulk sale language into sale order (.30); confer with T. Moyron regarding Ginnie Mae language and status of comments from the Cash Flow DIP Lenders (.30); follow up with L. Lerman with revised sale order (.40); confer with L. Lerman regarding comments to revised sale order (.20); forward comparison of initial language forwarded by L. Lerman with language incorporated into sale order (.50); attend to further review of Sale Order (.70); follow up with T. Moyron regarding status and outstanding items in need of attention (.50); review Fannie Mae objection and confirmed that current draft of sale order addresses the limited objection (.50); confer with Ginnie Mae counsel regarding latest comments to sale order (.20); review email from counsel to Fannie Mae signing off on comments to sale order (.30); attend to latest version of sale order regarding incorporation of additional comments (.80); review email from P. Moak regarding additional comments from Freddie Mac (.40); confer with P. Moak regarding same (.20); forwarded latest draft of sale order to M. Powers for UCC (.30); attend to status conference call with T. Moyron, S. Maizel, C. Montgomery, G. Miller and D. Cook (1.10); attend to folding in comments from P. Moak into sale order (.70); attend to circulating draft notice of second amended order (.20); attend to draft language for order addressing Customers Bank and related warehouse lenders objections (.60); circulate language regarding same (.10); review language from Customers Bank regarding same (.30); attend to revisions to notice of second amended order per T. Moyron's comments (.40); circulate notice to internal team for sign off (.30); review Freddie Mac provisions in sale order for consistency (.40); review emails from C. O'Leary and S. Maizel regarding bifurcated liability issues (.40); circulate latest draft of sale order with marked version (.20); confer with T. Moyron and S. Maizel regarding final comments to the notice of amended order and course of action regarding draft second amended order (.30); forwarded clean and redline versions to local counsel for filing (.20).</p>

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08/30/22	D. Cook	1.50	930.00	B130	Zoom conference with Dentons professionals regarding objections to BSI Sale (1.1); analyze Dentons team email communications with respect to same (.4).
08/30/22	T. Moyron	0.50	395.00	B130	Call with S. Maizel and C. O'Leary regarding language in sale order and proposed language from Customers.
08/30/22	T. Moyron	0.30	237.00	B130	Call with S. Maizel re BSI Sale order.
08/30/22	T. Moyron	0.40	316.00	B130	Analyze issues related to Customers proposed language re BSI sale order.
08/30/22	T. Moyron	0.20	158.00	B130	Correspond with counsel for Customers re BSI sale order.
08/30/22	T. Moyron	0.10	79.00	B130	Call with S. Maizel re BSI sale.
08/30/22	T. Moyron	0.80	632.00	B130	Zoom meeting with L. Jones regarding upcoming hearings re BSI sale and Freddie agreement.
08/30/22	T. Moyron	0.60	474.00	B130	Analyze limited objections and reservation of rights filed by Customers, Freddie, FNMA, etc.
08/30/22	T. Moyron	0.20	158.00	B130	Correspond with M. Caloway re amended agenda and status.
08/30/22	T. Moyron	0.40	316.00	B130	Analyze updated language in sale order and redlines.
08/30/22	T. Moyron	0.30	237.00	B130	Correspond with A. Samples re BSI sale order.
08/30/22	T. Moyron	0.30	237.00	B130	Further correspondence with T. Ramm, et al., re inquiry from Committee regarding prepetition payments and related analysis.
08/30/22	T. Moyron	0.20	158.00	B130	Correspond with counsel for GNMA, L. Lerman, regarding sale order and extension.
08/30/22	T. Moyron	0.20	158.00	B130	Call with L. Harrison and S. Maizel re final changes to sale order and notice re BSI sale.
08/30/22	T. Moyron	0.40	316.00	B130	Call with BSI representatives, T. Ramm, A. Samples, et al. re status of issues prior to sale hearing issue raised by Freddie Mac.
08/30/22	T. Moyron	0.40	316.00	B130	Analyze emails from K. Ferrier re inquiries from Rushmore re BSI sale (.2) and respond to same (.1); correspond with A. Samples re same (.1).
08/30/22	T. Moyron	0.40	316.00	B130	Call with advisors from Bravo and FGMC regarding sale and licenses.

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Date	Timekeeper	Hours	Amount	Task	Narrative
08/30/22	T. Moyron	0.20	158.00	B130	Correspond with M. Power regarding call re prepetition payments to Freddie.
08/30/22	T. Moyron	0.30	237.00	B130	Correspond with P. Omak re term sheet and non-bifurcated liability.
08/30/22	T. Moyron	0.50	395.00	B130	Conference call with S. Maizel re BSI sale matters and resolution.
08/30/22	T. Moyron	1.10	869.00	B130	Zoom meeting with L. Harrison, C. Montgomery, et al., regarding limited objections from FNMA, Freddie, and Customers and requested language in orders.
08/30/22	L. Macksoud	0.50	385.00	B130	Confer with counsel to Planet Home and Counsel to Rushmore re MSR sale motion and hearing.
08/30/22	G. Medina	0.50	180.00	B130	Correspond with T. Moyron regarding objections to Debtors' Motion for Authorizing Private Sale (0.1); retrieve and send to T. Moyron, S. Maizel, C. Montgomery and D. Cook Customers Bank's Limited Opposition and Limited Objection of FNMA (0.4).
08/30/22	G. Medina	0.50	180.00	B130	Call with C. Montgomery regarding lien searches (0.2); review documents received related to liens (0.3).
08/30/22	S. Maizel	4.50	4,365.00	B130	Zoom conference with FTI, BSI, A. Samples, etc. re sale of MSRs to BSI (.4); telephone conference with T. Moyron and T. Rahm re same (.3); telephone conference with various parties re BSI sale (.4); telephone conference with T. Moyron re Freddie Mac issues with BSI sale (.7); telephone conference with T. Moyron, etc. re non-bifurcated issues with regard to BSI sale (.3); telephone conference with T. Moyron re Fannie Mae and Freddie Mac issues with BSI sale (.1); zoom conference with L. Harrison, etc. re revising order on BSI sale (1.1); review and respond to emails re revisions to BSI Sale order (.7); review and respond to emails re non-bifurcated issues with regard to BSI Sale (.5).
08/30/22	S. Maizel	1.60	1,552.00	B130	Zoom conference with L. Jones, etc. re hearing on BSI sale motion and related issues (.8); telephone conference with T. Moyron re same (.3); telephone conference with C. O'Leary re order on BSI sale (.5).

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Date	Timekeeper	Hours	Amount	Task	Narrative
08/30/22	C. Montgomery	2.30	2,783.00	B130	Zoom call with L. Harrison, S. Maizel, G. Miller and T. Moyron regarding responses to multiple reservation of rights requests and limited objections (1.1); Teams call with T. Meerovich, T. Moyron and others regarding BSI hearing (.5); Teams call with T. Meerovich, T. Moyron and others regarding non-bifurcated liability issue (.5); communications with K. Ziman regarding impact BSI sale on TCB servicing rights (.1); communications with K. Biron regarding impact on Flagstar of BSI sale (.1).
08/31/22	C. Montgomery	2.00	2,420.00	B130	Review communications with T. Moyron and O. Alaniz regarding Freddie Mac order changes (.2); communications with L. Harrison, G. Alessandra, M. Powers regarding sale order (.1); attend hearing regarding BSI sale and Freddie Mac 9019 Settlement (.8); communications with C. O'Leary and T. Moyron regarding Flagstar loan sale (.4); communications with T. Moyron, M. Power, S. Warren, L. Harrison, O. Alaniz regarding Committee reservation of rights language and resolution of same (.5).
08/31/22	S. Schrag	0.50	325.00	B130	Participate in hearing on BSI sale and settlement with Freddie Mac.
08/31/22	S. Maizel	3.80	3,686.00	B130	Attend hearing on Freddie Mac settlement (.8); telephone conference re pending legal issues w/ D. Oien (.4); prepare for and participate in zoom conference re customers issues with T. Meerovich, etc. (1.0); review and respond to emails re same (1.6).
08/31/22	E. Smith	2.10	2,152.50	B130	Confer with counsel for warehouse provider JVB, P. Sidiqui, regarding loan servicing transfer questions raised by subservicer (SLS) (.6); confer with counsel for Barclays as the DIP repo buyer regarding waiver and extensions of time to file and hold a confirmation hearing on a POR (.6); reviewed DIP MSFTA annex redlines (.4); confer with T. Moyron regarding DIP repo buyer waiver and extension of POR filing and confirmation milestones, subservicing transfer issue, and revisions to DIP repo facility hedging documentation (.5).
08/31/22	L. Macksoud	0.70	539.00	B130	Participate in hearing on sale motion.

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Date	Timekeeper	Hours	Amount	Task	Narrative
08/31/22	L. Harrison	1.90	2,166.00	B130	Confer with T. Moyron regarding status of additional edits to sale order (.30); proceed to insert language from Customers Bank and UCC (.50); circulate redline and clean copies of sale order and sale agreement to M. Caloway (.40); review draft notice of amended order (.20); circulate same to M. Caloway (.10); follow up with M. Caloway regarding status of filing COC with order (.40).
08/31/22	D. Cook	0.90	558.00	B130	Telephone conference with L Harrison regarding revised BSI Sale Order (.1); follow-up telephone conference with L Harrison regarding same (.1); analyze revised order in connection with submission of same (.2); analyze draft notice thereof in connection with submission of same (.2); analyze email communications between Dentons, UCC, Fannie Mae and Freddie Mac and other parties-in-interest with respect to language to resolve issues in connection with sale order (.3).
08/31/22	T. Moyron	2.10	1,659.00	B130	Prepare emails to O. Alaniz, M. Power, and S. Warren re proposed language and various additional proposals to reach consensus on BSI sale order (.5); analyze emails from O. Olaniz, M. Power, and S. Warren regarding proposed provisions and analyze same (.6); conference calls with M. Power (.1), S. Warren (.1), O. Alaniz re same (.1) re same; analyze language proposed by Customers (.2); correspond with T. Meerovich, et al., regarding Customers language (.4); prepare email to counsel for Customers re approved language (.1).
08/31/22	T. Moyron	0.90	711.00	B130	Further correspondence with L. Harrison regarding finalization of sale order, redlines and notice (.3); analyze final sale order, redline and notice (.4); correspond with M. Caloway re same (.2).

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Date	Timekeeper	Hours	Amount	Task	Narrative
08/31/22	L. Harrison	3.60	4,104.00	B130	Review comments from O. Alaniz to sale order (.20); review comments from M. Powers regarding committee comments (.30); confer with T. Moyron regarding insertion of comments into order (.20); attend to inserting comments from Freddie Mac and committee (.30); review comments from L. Lerman from Ginnie Mae (.20); incorporated comments from Ginnie Mae (.30); attend to hearing on sale and 9019 motion (.80); follow up with T. Moyron regarding open items (.20); review emails addressing Customers' Bank and Committee language (.40); follow up with T. Moyron regarding status (.30); forward documents to D. Cook regarding Third Amended Proposed Order and related pleadings (.40).
Subtotal		290.70	299,262.50		

B140 - Relief from Stay/Adequate Protection Proceedings

Date	Timekeeper	Hours	Amount	Task	Narrative
08/01/22	S. Schrag	0.40	260.00	B140	Confer with J. John regarding partition case in Georgia and suggestion regarding lifting automatic stay.
08/02/22	S. Schrag	1.10	715.00	B140	Confer with B. Hilton, plaintiffs's counsel in Georgia partition case, regarding potential assignment (.2); follow up with J. John regarding the status of case (.7); confer with T. Moyron regarding the same (.2).
08/05/22	T. Moyron	0.90	711.00	B140	Analyze motion to lift stay by Flagstar and motion to shorten same (.7); analyze emails from J. Feldsher, L. Jones, et al., re motion for relief from stay (.2).
08/05/22	T. Moyron	0.10	79.00	B140	Analyze email from K. Ferrier re Flagstar relief from stay motion.
08/08/22	S. Maizel	0.10	97.00	B140	Review Flagstar motion for relief from the automatic stay.
08/08/22	T. Moyron	0.60	474.00	B140	Analyze matters related to Flagstar relief from stay motion and timing (.3); analyze email from T. Ramm re Flagstar (.1); and correspond with L. Macksoud, et al., regarding same (.2).
08/08/22	D. Kaur	1.50	855.00	B140	Communications regarding research project.

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Date	Timekeeper	Hours	Amount	Task	Narrative
08/09/22	D. Kaur	0.50	285.00	B140	Attended call to discuss research re GNMA.
08/10/22	D. Kaur	2.00	1,140.00	B140	Conducted research (1.5); Communications regarding the same (.5).
08/10/22	T. Moyron	0.40	316.00	B140	Zoom conference with C. Montgomery, et al., re Customers stipulation re relief from stay.
08/10/22	G. Medina	1.10	396.00	B140	Correspond with D. Kaur regarding research project (0.1); review American Home Mortgage Holdings Inc. docket and pleadings regarding sequence of pleadings of The United States Motion to Turn over the property to the Government National Mortgage Association ("GNMA") and their exemption from the automatic stay (0.8); correspond with D. Kaur and send pleadings filed (0.2).
08/10/22	S. Maizel	0.50	485.00	B140	Zoom conference with C. Montgomery, etc. re Customers stipulation re relief from stay (.4); review and revise stipulation re Customers motion for relief from stay (.1).
08/10/22	S. Maizel	0.40	388.00	B140	Review and revise Customers stipulated stay relief order.
08/11/22	D. Kaur	1.50	855.00	B140	Communications regarding research re GNMA.
08/17/22	S. Schrag	0.50	325.00	B140	Review foreclosure decree in state court proceeding (.1); confer with A. Pendexter regarding the same (.1); confer with N. Burkett regarding the same (.1); confer with B. Hilton regarding case status (.1); confer with J. John regarding whether FGMC has interest in property and whether mortgage is being paid (.1).
08/17/22	G. Medina	0.60	216.00	B140	Assist G. Miller prepare and assemble the Motion to Approve Freddie Mac Settlement (0.2); Stipulation regarding Adequate assurances (0.2); and the Freddie Mac Settlement Term Sheet (0.2).
08/17/22	D. Kaur	3.00	1,710.00	B140	Conducted research
08/23/22	D. Kaur	3.00	1,710.00	B140	Reviewed and circulated research.

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Date	Timekeeper	Hours	Amount	Task	Narrative
08/29/22	S. Schrag	0.30	195.00	B140	Review materials provided by J. John regarding CA Labor Commissioner case (.1); confer with J. John, T. Moyron, and S. Maizel regarding the same (.1); conduct research related to automatic stay (.1).
08/30/22	S. Schrag	0.80	520.00	B140	Confer with J. John and C. Reeves regarding Carrie Mayse employment claim (.2); conduct research related thereto (.4); confer with T. Moyron and S. Maizel regarding the same (.2).
Subtotal		19.30	11,732.00		

B150 - Meetings of and Communications with Creditors

Date	Timekeeper	Hours	Amount	Task	Narrative
08/03/22	S. Maizel	1.50	1,455.00	B150	Zoom call with M. Schmergel, US Dept of Justice, etc. re GNMA issues (1.3); review and respond to emails re same (.2).
08/03/22	S. Maizel	0.30	291.00	B150	Telephone conference with T. Moyron and M. Dundoon re pending FCA claim issues.
08/03/22	T. Moyron	0.30	237.00	B150	Telephone conference with S. Maizel and M. Dundoon re pending FCA claim issues.
08/03/22	T. Moyron	1.30	1,027.00	B150	Zoom call with M. Schmergel, US Dept of Justice, et al., re GNMA issues.
08/05/22	T. Moyron	0.30	237.00	B150	Analyze email from J. Orbach re attached confidentiality and redline (.1); analyze email from T. Cains re same and attachments (.2).
08/12/22	S. Schrag	0.40	260.00	B150	Listen to voicemail from former homeowner whose home was foreclosed upon (.1); confer with T. Moyron and S. Maizel regarding the same (.1); return call to former homeowner and left voicemail (.1); call with former homeowner (.1).
08/12/22	S. Maizel	0.80	776.00	B150	Telephone conference with M. Querrey re severance issues, etc. (.5); review Querrey employment agreement (.2); review and respond to emails re same (.1).
08/15/22	C. Montgomery	0.40	484.00	B150	Zoom call with Committee regarding BSI MSR sale (.4).

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Date	Timekeeper	Hours	Amount	Task	Narrative
08/17/22	C. Montgomery	0.50	605.00	B150	Review presentation to committee on MSR sale and communications with T. Moyron and S. Maizel regarding same (.4); phone call with T. Moyron regarding same (.1).
08/18/22	S. Maizel	1.00	970.00	B150	Telephone conference with T. Moyron and S. Warren re Fannie Mae issues (.3); review and respond to emails re same (.7).
08/18/22	S. Maizel	0.50	485.00	B150	Telephone conference with T. Moyron re Fannie Mae issues.
08/23/22	C. Montgomery	0.10	121.00	B150	Communications with T. Moyron and J. Krasne regarding Alpha Mortgage loan purchase inquiry at 341 meeting.
08/24/22	C. Montgomery	0.70	847.00	B150	Communications with T. Moyron and G. Miller regarding Alpha Mortgage loan purchase question (.2); communications with T. Moyron regarding Bravo loan sale inquiry by the Committee (.5).
08/26/22	C. Montgomery	1.30	1,573.00	B150	Phone call with G. Miller regarding Anchor Mortgage purchase and prepetition repurchase proceeds (.2); communications with M. Power and T. Moyron regarding committee information requests (.1); review T. Moyron proposed response to Committee (.5); review supplemental information from C. Qian and communications with G. Miller regarding same (.5).
08/30/22	C. Montgomery	0.40	484.00	B150	Communications with T. Moyron and M. Indelicato regarding historical financing information request (.1); review prepetition UCC search results and communications with G. Medina re same (.3).
08/31/22	C. Montgomery	0.10	121.00	B150	Communications with T. Moyron and R. Heidenreich regarding Committee discovery requests.
	Subtotal	9.90	9,973.00		

B160 - Fee/Employment Applications

Date	Timekeeper	Hours	Amount	Task	Narrative
08/01/22	T. Moyron	0.80	632.00	B160	Review and revise supplemental declaration re Dentons employment.

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Date	Timekeeper	Hours	Amount	Task	Narrative
08/01/22	T. Moyron	0.40	316.00	B160	Analyze Dentons retention order and related emails from M. Caloway.
08/01/22	S. Maizel	0.80	776.00	B160	Review and revise Dentons employment order (.5); review and respond to emails re revisions to same (.3).
08/01/22	S. Maizel	0.80	776.00	B160	Review and revise supplemental declaration re Dentons employment.
08/10/22	S. Maizel	0.40	388.00	B160	Review and respond to emails re supplement connections disclosure.
	Subtotal	3.20	2,888.00		

B170 - Fee/Employment Objections

Date	Timekeeper	Hours	Amount	Task	Narrative
08/01/22	C. Doherty, Jr.	4.40	3,058.00	B170	Prepare Supplemental Meerovich Declaration (1.1); prepare revised final wage order to effectuate settlement with UCC (1.5); review and respond to emails regarding upcoming hearing (1.0); review objections and pleadings set for hearing for context for employment motions (.8).
	Subtotal	4.40	3,058.00		

B180 - Avoidance Action Analysis

Date	Timekeeper	Hours	Amount	Task	Narrative
08/24/22	C. Montgomery	0.70	847.00	B180	Communications with T. Moyron regarding committee discovery and review financial statement re same (.2); search for working file on PIMCo transactions (.5).
	Subtotal	0.70	847.00		

B185 - Assumption/Rejection of Leases and Contracts

Date	Timekeeper	Hours	Amount	Task	Narrative
08/02/22	S. Schrag	0.50	325.00	B185	Correspond with C. Peoples regarding hearing on Motion to Reject Leases and preparations related thereto (.2); confer with L. Macksoud regarding the same (.1); conduct research regarding the same (.2).

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Date	Timekeeper	Hours	Amount	Task	Narrative
08/03/22	S. Schrag	0.80	520.00	B185	Confer with T. Moyron and J. John regarding correspondence from B. Rost and August rent (.2); confer with B. Rost regarding the Rejection Motion (.2); confer with C. Peoples, M. Jacobson, and M.A. Kaptain regarding the same (.2); review underlying leases for potential damages (.2).
08/03/22	T. Moyron	0.20	158.00	B185	Analyze emails from J. John, et al., re rejection motion and further correspond re same.
08/04/22	S. Schrag	0.50	325.00	B185	Review correspondence from J. White regarding payment from Subtenant (.1); confer with T. Moyron and S. Maizel regarding the same (.1); confer with C. Peoples, J. John, and J. White regarding the same (.1); confer with Landlord's counsel regarding the same (.1); confer with G. Miller regarding the same (.1).
08/04/22	C. Doherty, Jr.	0.70	486.50	B185	Call with G. Miller regarding research project regarding subleases (.1); research regarding sublease rejection issue (.6).
08/05/22	C. Doherty, Jr.	0.80	556.00	B185	Call with G. Miller regarding research project regarding subleases (.5); prepare research memorandum regarding sublease issue (.3).
08/05/22	S. Schrag	2.80	1,820.00	B185	Review research related to subtenant rejection (.4); conduct research related thereto (.2); confer with G. Miller regarding the same (.3); review correspondence from M. Hyland regarding TCB account (.2); confer with G. Miller and T. Cairns (.4); confer with A. Helman regarding accounts (.1); confer with L. Macksoud regarding accounts (.3); review leases and consents to lease (.6); confer with Subtenant regarding Sublease (.2); confer with T. Moyron regarding the same (.1).
08/05/22	T. Moyron	0.30	237.00	B185	Analyze issues related to retroaction rejection of sublease (.1); correspond with G. Miller, et al., re same (.2).

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Date	Timekeeper	Hours	Amount	Task	Narrative
08/08/22	S. Schrag	0.60	390.00	B185	Confer with J. John and C. Peoples regarding security deposits (.1); review correspondence from B. Rost re Tysons Corner lease (.3); review material regarding resolution of sublease and lease (.2).
08/08/22	S. Schrag	0.60	390.00	B185	Confer with eGlobal regarding lease (.1); review email from B. Fost regarding lease and rejection motion (.2); confer with G. Miller regarding bounceback of Richard Lemmon email and call with corporate regarding the same (.3).
08/09/22	S. Schrag	1.60	1,040.00	B185	Confer with C. Peoples and J. John regarding Tysons Corner agreement (.4); confer with G. Miller regarding the same (.4); review additional material related to sublease and lease agreements (.4); review correspondence from B. Fost regarding potential resolution with subtenant (.2); confer with B. Fost regarding the same (.2).
08/10/22	S. Schrag	0.50	325.00	B185	Confer with C. Peoples regarding rent payment related to rejection notice (.2); confer with B. Fost regarding resolution of rejection motion (.1); confer with R. Lemmon regarding potential resolution of issues related to rejection motion (.1); call with B. Fost regarding the same (.1).
08/11/22	S. Schrag	1.20	780.00	B185	Review lease agreement for terms related to letter of credit (.4); confer with C. O'Leary regarding the same and rejection (.2); confer with J. John and C. Peoples regarding lease rejections and rent (.2); conduct research related thereto (.3); confer with L. Smith regarding LOC and rejection damages (.1).

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Date	Timekeeper	Hours	Amount	Task	Narrative
08/12/22	G. Medina	2.00	720.00	B185	Review at the request of L. Harrison and T. Moyron the ResCap bankruptcy case related to Freddie sale/assignment , review and analyze docket and pleadings related to the Sale Motion, Notice to Assume and Assign contracts, Sale Orders and Assumption and Assignments of Freddie Mac Agreements (0.9); review the Ditech Bankruptcy case related to Freddie sale/assignment and review and analyze docket and pleadings related to the Motion to Approve Disclosure Statement, Order and Notice of Cure Costs regarding Assumption and Assignment of Contracts (0.7); further correspond with T. Moyron and review and retrieve Disclosure Statement regarding defined terms regarding Freddie Mac Agreements (0.4).
08/12/22	S. Schrag	1.70	1,105.00	B185	Confer with R. Lemmon regarding return of rent payment and rejection of sublease (.1); confer with G. Miller regarding the same (.2); correspond with Tysons Corner landlord and subtenant regarding return of payment (.3); call with B. Rost regarding returning payment to Subtenant (.1); confer with C. Peoples and J. White regarding executing payment (.2); confer with L. Macksoud regarding TCB account (.1); review LOC with Tysons Corner Landlord (.2); conduct research regarding the same (.4); confer with J. John regarding LOC and rejection damages (.1).
08/13/22	S. Maizel	0.20	194.00	B185	Review and respond to emails from counsel for CFT NV Developments, LLC, re motion to reject leases.
08/13/22	S. Schrag	0.40	260.00	B185	Review correspondence from landlord's counsel regarding Nevada lease under rejection motion related to proposed order (.2); prepare analysis of the same (.1); confer with S. Maizel, T. Cairns, G. Miller, and T. Moyron regarding resolution related to proposed order (.1).

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Date	Timekeeper	Hours	Amount	Task	Narrative
08/15/22	S. Schrag	1.10	715.00	B185	Review correspondence from T. Cairns regarding rejection damages, admin expenses, and bar date motion (.2); review bar date motion (.3); confer with T. Cairns regarding the same (.2); confer with L. Roglen regarding language for rejection order (.3); confer with C. Peoples regarding return of deposit (.1).
08/16/22	S. Schrag	0.20	130.00	B185	Confer with B. Fost regarding deposit for Tysons Corner lease (.1); confer with J. John regarding the same (.1).
08/17/22	S. Schrag	0.30	195.00	B185	Review correspondence regarding Tysons Corner rent payment (.1); confer with B. Fost regarding the same (.2).
08/18/22	S. Schrag	0.50	325.00	B185	Confer with J. John regarding return of rent payment (.1); review correspondence from M. Simm of TCB regarding payment (.1); confer with R. Lemmon regarding the same (.1); follow-up with J. John regarding the same (.1); confer with B. Fost regarding the same (.1).
08/19/22	S. Schrag	0.10	65.00	B185	Call with J. John during reoccurring call to discuss rejection motion and return of rent and scratch and dent loans.
08/20/22	S. Schrag	1.40	910.00	B185	Confer with T. Moyron regarding leases set for rejection, conversation with potential buyer, and outstanding objection (.1); confer with T. Cairns, T. Moyron, and S. Maizel regarding Henderson objection (.2); correspond with C. Peoples regarding details on the same (.5); confer with Henderson landlord's counsel regarding potential resolution (.4); confer with J. John regarding return of the Tysons Corner payment (.2).
08/20/22	T. Moyron	0.30	237.00	B185	Correspond with S. Schrag, et al. (.2) and call with S. Schrag (.1) regarding outstanding issues related to Tuesday's hearing re motion to reject.

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08/22/22	T. Moyron	1.10	869.00	B185	Analyze emails from Joshua D. Levin-Epstein, et al., re matters related to lease rejection motion (.3); correspond with S. Schrag regarding calls and hearing (.3); analyze email from S. Schrag, et al, with respect to orders, redline and related matters (.3); call with S. Schrag, et al., regarding same (.2).
08/22/22	S. Schrag	6.20	4,030.00	B185	Confer with J. John regarding funds returned to subtenant for August rent (.1); confer with Tysons Corner Landlord and Subtenant regarding resolution of limited objection (.1); confer with G. Miller, T. Moyron, and T. Cairns regarding notice to Court (.1); confer with C. Peoples regarding Henderson objection (.2); review correspondence from C. Peoples regarding rejection motion (.3); confer with Henderson Landlord's counsel (.2); confer with T. Moyron and T. Cairns regarding the same (.2); confer with T. Cairns regarding the same (.1); confer with C. Montgomery regarding ACH transfers (.1); confer with B. Fost regarding the same (.3); confer with C. Peoples, T. Cairns, and D. Oien regarding final resolution of objections (.5); revise order (2.2); confer with Henderson Landlord's counsel regarding the same (.3); further revise order (.5); confer with T. Cairns regarding the same (.4); conduct research regarding local rules (.6).
08/23/22	S. Schrag	1.60	1,040.00	B185	Confer with T. Moyron and S. Maizel regarding timeline memo for client's review (.2); conduct research related thereto (.4); draft workstreams memo (1.0).
08/23/22	S. Schrag	0.10	65.00	B185	Confer with C. Peoples regarding follow-up communications to Henderson landlord.
08/23/22	C. Montgomery	1.80	2,178.00	B185	Review Mass Mutual and Everbank pool sale and servicing agreements (1.5); communications with L. Smith and C. O'Leary regarding EBO analysis (.3).

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Date	Timekeeper	Hours	Amount	Task	Narrative
08/24/22	S. Schrag	0.70	455.00	B185	Confer with C. Peoples regarding Henderson lease update related to rejected lease (.2); confer with J. John and D. Oien in reoccurring call regarding motion to reject executory contracts (.3); draft correspondence to T. Moyron, S. Maizel, and L. Smith regarding the same (.2).
08/25/22	S. Schrag	0.20	130.00	B185	Confer with T. Cairns regarding motion to reject executory contracts.
08/25/22	C. Montgomery	0.10	121.00	B185	Communications with C. O'Leary regarding Mass Mutual servicing termination.
08/26/22	S. Schrag	0.10	65.00	B185	Confer with L. Davis Jones, T. Cairns, and M. Caloway regarding rejection motion.
08/26/22	T. Moyron	0.20	158.00	B185	Analyze matters related to rejection motion.
08/29/22	S. Schrag	0.60	390.00	B185	Confer with J. John, T. Moyron, and S. Maizel regarding list of executory contracts to be rejected (.1); confer with J. John and C. Reeves regarding discussion of the same (.1); review and analyze correspondence and exhibit from C. Reeves (); draft motion to reject (.5).
08/30/22	S. Schrag	8.40	5,460.00	B185	Confer with J. John, T. Moyron, and S. Maizel regarding list of executory contracts to be rejected in omnibus motion (.1); confer with J. John and C. Reeves regarding discussion of the same (.1); review and analyze correspondence and exhibit from C. Reeves regarding the same (1.1); draft omnibus motion to reject (2.1); draft proposed order (1.9); draft exhibit of contracts and leases(1.4); draft notice of motion (.9); confer with J. Levin-Epstein regarding security deposit on file with landlord related to rejection damages (.3); review agreement related to the same (.3); confer with T. Moyron and S. Maizel regarding the same (.2).

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Date	Timekeeper	Hours	Amount	Task	Narrative
08/31/22	S. Schrag	2.20	1,430.00	B185	Participate in reoccurring call with J. John, D. Oien, and J. Krasne regarding Schedule G amendment and rejection motion (.2); review revised rejection exhibit (.3); review and revise rejection motion (.3); confer with T. Moyron regarding the same (.3); confer with A. Samples regarding the same (.1); confer with T. Cairns regarding the same (.3); revise Schedule 1 (.7).
Subtotal		42.60	28,599.50		

B190 - Other Contested Matters (excl. assumption/rejection motions)

Date	Timekeeper	Hours	Amount	Task	Narrative
07/01/22	J. Murphy	6.20	6,479.00	B190	Attention to emails in connection with first day matters (.7); attend zoom of first day hearing (5.5).
07/01/22	T. Moyron	2.60	2,054.00	B190	Prepare for First-Day Hearings, and calls with S. Maizel, et al., re same.
08/02/22	E. Smith	4.90	5,022.50	B190	Confer with T. Moyron to prepare for second day hearing on post-petition financing, cash collateral, employee retention plans, and warehouse provider motions for relief relating to their control and disposal of assets on prepetition warehouse lines (0.2); attended hearing on second day motions (4.2); confer with Dentons team, T. Moyron, regarding implementation of actions based upon completion of second day hearing (.5).
08/02/22	S. Maizel	4.30	4,171.00	B190	Participate in hearing on various motions, including DIP Facilities and KERF/KEIP.
08/02/22	S. Maizel	0.50	485.00	B190	Telephone conference with T. Moyron re status of various orders from hearing, etc.
08/09/22	S. McCandless	0.70	689.50	B190	Review C. Doherty's comments and related information for defense of WARN claims.
08/09/22	D. Cook	1.60	992.00	B190	Draft response to Flagstar stay relief motion (1.5); email correspondence with T Moyron regarding Flagstar proposed order concerning same (.1).
08/09/22	S. Maizel	0.90	873.00	B190	Review and revise draft 9019 motion re Freddie Mac sales.

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Date	Timekeeper	Hours	Amount	Task	Narrative
08/10/22	D. Cook	1.60	992.00	B190	Draft response to Flagstar stay relief motion (1.3); analyze email communications among Dentons, company and Flagstar regarding potential resolution in connection with same (.3).
08/11/22	D. Cook	0.80	496.00	B190	Telephone conference with G Miller regarding Fannie Mae 9019 motion (.1); email correspondence regarding same (1); draft shell 9019 motion regarding same (.6).
08/15/22	S. Maizel	2.00	1,940.00	B190	Zoom conference with DIP Cash Flow Lender, etc. re pending settlement with Freddie Mac (1.0); zoom conference with PSZJ, etc. re same (0.6); telephone conference with Paul Moak, etc. re Freddie Mac settlement (.4).
08/15/22	S. Maizel	2.20	2,134.00	B190	Review and respond to emails re motion to approve settlement with Freddie Mac (1.2); revising motion to approve settlement with Freddie Mac and motion to shorten time related to that motion (1.0).
08/15/22	D. Cook	3.30	2,046.00	B190	Draft notice of stipulation between Debtors and Freddie Mac re adequate protection and assurances (.6); analyze stipulation in connection with same (.3); draft motion to approve stipulation with respect to same (1.7); telephone conferences with C Montgomery with respect to same (.3); email communication with C Montgomery regarding same (.1); analysis of Dentons team emails with respect to form of stipulation approval pleading (.3).
08/16/22	D. Cook	1.20	744.00	B190	Revise motion to approve stipulation between Debtors and Freddie Mac re adequate protection and assurances (.7); telephone conference with T Moyron with respect to same (.1); analyze Debtor professional email communications with respect to filing of same (.4).

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Date	Timekeeper	Hours	Amount	Task	Narrative
08/18/22	E. Smith	1.50	1,537.50	B190	Review correspondence from counsel for GSE relating to objections to MSR sale motion (.3); attended workstream catch up call with FGMC, A. Samples, FTI, T. Meerovitch, Dentons team, S. Maizel, and cash flow DIP lender and counsel (.9); reviewed terms of final cash management order in response to a demand for payment of fees by Deutsche Bank (.3).
08/23/22	S. Maizel	0.40	388.00	B190	Zoom conference with J. Davis, G. Lombardo, GT, etc. re UCC discovery issues.
08/23/22	T. Moyron	0.40	316.00	B190	Conference call with GT advisors, including J. Davis and G. Lombardo, S. Maizel, et al., re discovery.
08/23/22	S. Alberts	0.80	792.00	B190	Review and assess new WARN decision by Judge Goldblatt (.4) and provide comments on decision is not applicable to our case (.3) and follow up (.1).
08/25/22	T. Moyron	0.40	316.00	B190	Analyze documents produced to Committee.
08/25/22	T. Moyron	0.10	79.00	B190	Analyze email from J. Schwartz re document production.
08/26/22	T. Moyron	0.30	237.00	B190	Zoom meeting with J. Davis, N. Peterman, et al., regarding discovery.
08/26/22	K.M. Howard	1.20	408.00	B190	Analysis of docket regarding matters before the court on 8/31/22 (.2); assemble pleadings pertaining to Debtors' Debtors' Motion for Private Sale and Transfer of Servicing Rights (.4); review assembled pleadings (.2); prepared indices (.3); finalize prepare email to I. Cruz regarding same (.1).
08/26/22	K.M. Howard	0.80	272.00	B190	Analysis of docket and assemble pleadings pertaining to Debtor's Motion to Approve Settlement with Federal Home Loan Mortgage (.3); prepare indices (.2); review and finalize hearing binders (.2); prepare email to I. Cruz regarding same (.1).

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Date	Timekeeper	Hours	Amount	Task	Narrative
08/26/22	K.M. Howard	0.80	272.00	B190	Analysis of docket and assemble pleadings pertaining to Debtor's Stipulation with Freddie Mac for Adequate Protection (.3); prepare indices (.3); finalize hearing binders (.1); prepare email to I. Cruz regarding same (.1).
08/27/22	D. Cook	0.40	248.00	B190	Email communication with T Moyron and other Dentons professionals with respect to motion to approve stipulation with FNMA (.1); analysis with respect to internal settlement material communications with respect to FNMA settlement (.3).
08/28/22	D. Cook	2.10	1,302.00	B190	Draft motion to assume FNMA stipulation (1.9); email communications with T Moyron and Dentons professionals regarding same (.2).
08/31/22	C. O'Leary	1.60	1,360.00	B190	Prepare for/attend motion hearing re: BSI Private Sale Motion and Freddie Settlement Motion.
	Subtotal	43.60	36,645.50		

B210 - Business Operations

Date	Timekeeper	Hours	Amount	Task	Narrative
07/27/22	T. Moyron	0.40	316.00	B210	Analyze emails from O. Alaniz et al., re Repo DIP order.
08/01/22	R. Richards	0.10	94.00	B210	Emails regarding critical vendor deal.
08/01/22	S. Schrag	0.40	260.00	B210	Confer with J. John and T. Cairns regarding Weiner Brodsky and OCP Motion.
08/09/22	J. Murphy	1.60	1,672.00	B210	Review draft SRPA with BSI.
08/10/22	J. Murphy	2.60	2,717.00	B210	Review several versions of Freddie Mac settlement motion and draft order and markup same and attention to emails re same.
08/10/22	J. Murphy	1.80	1,881.00	B210	Review and markup MSR Transaction Overview and BSI SRPA and attention to emails re same.

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Date	Timekeeper	Hours	Amount	Task	Narrative
08/12/22	E. Smith	0.40	410.00	B210	Review correspondence regarding resolution of commercial lease claim (.2) and purchaser comments on FGMC revisions to MSR purchase and sale agreement (.2).
08/23/22	T. Moyron	0.40	316.00	B210	Call with G. Miller regarding DB and amounts owed and potential resolution (.3) and call with G. Miller and T. Meerovich re same (.1).
08/25/22	T. Moyron	0.30	237.00	B210	Conference call with S. Schrag, et al., regarding scratch and dent loans.
08/25/22	E. Smith	0.60	615.00	B210	Confer with S. Schrag, T. Moyron, and S. Maizel regarding ordinary course return of mortgagor over payments for loan related fees and services (.4); reviewed correspondence regarding completion of DIP warehouse facility hedging agreement.
08/25/22	S. Schrag	0.50	325.00	B210	Confer with T. Moyron, S. Maizel, and L. Smith regarding best execution for scratch and dent loans (.3); confer with J. John regarding the same (.2).
08/31/22	J. Murphy	0.70	731.50	B210	Review revised MSFTA and email team signoff.
	Subtotal	9.80	9,574.50		

B220 - Employee Benefits/Pension

Date	Timekeeper	Hours	Amount	Task	Narrative
08/01/22	S. Alberts	0.70	693.00	B220	Communication about UST request concerning unredacting KEIP information (.3); review UCC responses/objections (.1); assess and provide thoughts to colleagues (.3).
08/02/22	S. Alberts	1.00	990.00	B220	Receive, review and response to UCC counsel.
08/02/22	C. Doherty, Jr.	2.50	1,737.50	B220	Prepare for and attend and listen to hearing of Wage Motion and KEIP/KERP (1.7); review and respond to emails regarding hearing and employment relief (.5); call with M. Jacobson regarding wage motion order (.2); call with S. Maizel regarding wage motion order (.1).

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Date	Timekeeper	Hours	Amount	Task	Narrative
08/03/22	C. Doherty, Jr.	0.30	208.50	B220	Review and respond to questions from client regarding Wage Order.
08/04/22	S. Alberts	0.70	693.00	B220	Communications about Mr. Querrey (.4) and follow ups (.1), (.2).
08/04/22	R. Heidenreich	0.80	744.00	B220	Telephone conference with T. Myron regarding initial analysis and proposed next steps; prepare email regarding work projects for WARN Act Litigation.
08/05/22	S. Alberts	0.20	198.00	B220	Communication about insider definition (.1) and follow up (.1).
08/08/22	D. Cook	0.50	310.00	B220	Zoom conference with Dentons team and FTI team regarding KEIP/KERP (.5).
08/08/22	C. Doherty, Jr.	0.50	347.50	B220	Prepare written analysis regarding strategy for WARN claims (.3); review and respond to emails regarding employment issues (.2).
08/08/22	S. Schrag	0.30	195.00	B220	Confer with J. John, D. Oien, S. Maizel, and J. Krasne to discuss outstanding issues including insiders (.2); review correspondence from S. Maizel regarding insiders (.1).
08/09/22	C. Doherty, Jr.	1.00	695.00	B220	Prepare memorandum regarding Bankruptcy Code strategy for WARN claims (.6); call with T. Moyron regarding Wage Order (.1); review and respond to emails regarding Wage Order (.2); review and respond to emails regarding KEIP and KERP motion (.2).
08/10/22	C. Doherty, Jr.	0.50	347.50	B220	Review and respond to emails regarding Wage Order and KEIP and KERP and answer questions from FTI regarding same (.2); provide comments to releases for KERP participants (.3).
08/11/22	C. Doherty, Jr.	1.60	1,112.00	B220	Prepare drafts of modifications to KEIP based upon compromise with UCC (.3); call with S. Alberts regarding KEIP modifications (.5); prepare for and attend KERP/KEIP hearing (.7); review and respond to emails regarding KEIP and KERP order and entry (.1).

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Date	Timekeeper	Hours	Amount	Task	Narrative
08/11/22	S. Alberts	2.30	2,277.00	B220	Receive and respond to email concerning Mr. Querrey (.2), response from S. Maizel (.1) and reply concerning related issue (.2); receive from T. Moyron inquiry concerning KEIP terms and desire to modify KEIP document (.1), assess certain provisions and internal communication with C. Doherty and draft comments together (.4) send comments to working group (.1), follow up email from T. Moyron (.1) and call from S. Maizel (.2), revise and expand response (.3), and conference with D. Imhoff to confirm changes to KEIP (.2) revise calculations (.2), and follow up concerning resolution with UCC (.2).
08/12/22	S. Schrag	0.20	130.00	B220	Participate in reoccurring call with D. Oien, S. Maizel, and J. Krasne to discuss upcoming RIF and KERP payments.
08/12/22	C. Doherty, Jr.	0.10	69.50	B220	Review and respond to emails regarding KEIP/KERP and employee issues.
08/15/22	C. Doherty, Jr.	0.20	139.00	B220	Analyze FTI email regarding Wage motion question.
08/16/22	C. Doherty, Jr.	0.40	278.00	B220	Review and respond to emails regarding KERP and KEIP effectuation and Wage Order; review board minutes regarding background for employee issues (.2).
08/16/22	S. Alberts	0.80	792.00	B220	Receive client inquire concerning KERP payout (.1), request and obtain unredacted materials (.1), review and consider unredacted materials and draft assessment of situation (.6).

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Date	Timekeeper	Hours	Amount	Task	Narrative
08/17/22	S. Alberts	2.00	1,980.00	B220	Review KERP order and schedule (.2) and send email to Dentons team about KERP payment terms (.3), follow up with PSZJ to obtain final filed version (.1) and confirmed no material changes (.2), receive inquiry from T. Moyron about timing of payment of KEIP (.1), review KEIP terms and order (.3), and provide recommendation (.2), receive and respond to communication from T. Meerovich about timing of waiver (.1), review KEIP terms (.2) and respond (.1), communicate with S. McCandless about whether she had drafted waiver and release form for KEIP (.1) and follow up with S. McCandless that I will draft KEIP releases (.1).
08/17/22	C. Doherty, Jr.	0.70	486.50	B220	Attend call with S. Maizel, S. Alberts and T. Moyron regarding Wage Order (.5); review and respond to emails regarding questions regarding Wage Order and KEIP/KERP (.2).
08/18/22	C. Doherty, Jr.	0.90	625.50	B220	Review and respond to emails regarding KEIP and KERP and Wage Order (.2); prepare comments to release for KEIP payment (.7).
08/18/22	G. Medina	0.30	108.00	B220	Review request from T. Moyron and send KEIP order to D. Oien.
08/18/22	S. Alberts	1.90	1,881.00	B220	Communicate with S. McCandless about KERP and KEIP releases (.2), review KERP release and consider needed changes for KEIP release (.4), review KEIP terms (.2) and revise for first KEIP bonus (.6) and circulate (.1); receive request from M. Calloway concerning wage motion and follow up (.2), emails with T. Meerovich concerning whether certain KEIP recipients are based in California and above 40 years old (.2).

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Date	Timekeeper	Hours	Amount	Task	Narrative
08/19/22	S. Alberts	1.00	990.00	B220	Prepare for working group call by reviewing waivers for KEIP and KERP (.2), response to question from S. McCandless confirming existence of a California KEIP participant (.1), conference with client and working group (.5), and follow-up communication with S. McCandless call (.1) and S. Maizel (.1).
08/19/22	C. Doherty, Jr.	0.20	139.00	B220	Review and respond to emails regarding KEIP release.
08/21/22	C. Doherty, Jr.	0.10	69.50	B220	Review emails concerning Wage Order.
08/22/22	S. Alberts	1.40	1,386.00	B220	Communicate about status (.2), finalize KEIP Over Release (.3), conference with FTI and co-counsel about Former Employee issues (.4), follow up about KEIP CA release with S. McCandless (.1), obtain and review draft (.1) and send KEIP releases to Company (.1) and follow up (.2).
08/22/22	C. Doherty, Jr.	0.70	486.50	B220	Call with S. Alberts, T. Moyron and S. Maizel regarding KERP & KEIP Issues (.5); review and respond to email questions regarding KERP & KEIP (.2).
08/23/22	C. Doherty, Jr.	0.40	278.00	B220	Review recent decision from bankruptcy court regarding WARN items and email analysis regarding same.
08/23/22	L. Harrison	0.80	912.00	B220	Review recent opinion from Judge Goldblatt regarding WARN (.50); forward same to T. Moyron, S. Maizel and C. Montgomery for further review (.30).
08/24/22	S. Alberts	0.20	198.00	B220	Communication with A. Samples about who should countersign certain KEIP release agreements (.1) and follow up (.1).
08/27/22	S. Alberts	0.40	396.00	B220	Receive inquiry from S. McCandless about potential number of KERP payments (.1), review terms of KERP (.2) and respond (.1).
08/29/22	S. Alberts	0.90	891.00	B220	Receive and review draft KERP release with C. Doherty comments (.3), review KERP and revise release (.4) and circulate with note (.2).

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Date	Timekeeper	Hours	Amount	Task	Narrative
08/29/22	C. Doherty, Jr.	0.70	486.50	B220	Draft comments to KERP Release (.6); respond to emails from J. Peterson and S. McCandres regarding KEIP and KERP motion (.1).
08/30/22	C. Doherty, Jr.	0.20	139.00	B220	Review and respond to emails from J. Peterson and S. McCandres and S. Alberts regarding KEIP and KERP motion and releases.
08/30/22	S. Alberts	1.70	1,683.00	B220	Receive and review email and assessment from S. Maizel about salary increases and potential impact on KERP (.1), review KERP and consider potentially applicable terms (.2), draft and sent proposed revisions to communications (.3); receive response from S. McCandless to KERP release and assess proposed changes (.2), conference with S. McCandless about KERP release (.6), and message to T. Moyron (.1) and follow up with S. McCandless (.1) and T. Moyron (.1).
08/31/22	C. Doherty, Jr.	0.10	69.50	B220	Review final drafts of KERP releases.
	Subtotal	29.20	25,161.50		

B230 - Financing/Cash Collections

Date	Timekeeper	Hours	Amount	Task	Narrative
07/01/22	E. Smith	11.70	11,992.50	B230	Reviewed revisions to cash flow DIP loan agreement draft (.9); signed off on revised version of cash flow DIP loan agreement (.2); confer with Dentons team regarding demands for adequate protection of warehouse lender cash collateral (.9); confer with Claude Montgomery regarding permitted and intended uses of Barclays warehouse line availability (.6); attended hearing on first day motions (5.5); attended catch up call with the Board to update them on today's hearing and results (1.3); prepare for closing and funding of cash flow and repo DIP facilities (1.4); attention to satisfaction of conditions precedent to closing of DIP credit facilities (.9).

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Date	Timekeeper	Hours	Amount	Task	Narrative
07/02/22	E. Smith	0.60	615.00	B230	Review and prepare correspondence regarding completion of DIP credit facility closings and preparation for first advances under those facilities on July 5th.
07/03/22	E. Smith	0.60	615.00	B230	Review comments on Signature Bank deposit account control agreement (.3); prepare correspondence regarding review of DACA (.3).
07/04/22	E. Smith	0.40	410.00	B230	Review further revised Signature Bank deposit account control agreement (.2); review and prepare correspondence regarding additional revisions (.2).
07/27/22	T. Moyron	0.30	237.00	B230	Prepare email to E. Schnable re adjournment of hearing on all matters (.1); correspond with M. Caloway re same (.2).
08/01/22	C. Montgomery	9.10	11,011.00	B230	Communications with T. Moyron, P. Partee and B. Clarke regarding pricing side letter (.2); communications with B. Clarke, P. Partee regarding updates to Final DIP Repo Order (.1); communications with M. Powers and T. Moyron regarding pricing side letter (.2); participate in witness preparation for T. Meerovich (2.2); further revisions to Supplemental Declaration and communications with L. Macksoud , J. Krasne and N. Son.. regarding same (2.2); communications with N. Peterman regarding same (.1); communications with G. Miller regarding Freddie Mac Stipulation (.2); review J. Krasne comments reply brief (.1); communications with S. Maizel and N. Peterman regarding disclosure statement extension (.1); phone call B. Oppenheimer regarding DIP size exhibit (.1); review preferential payments and insider transfers as DIP collateral (.4); B. Clarke communications regarding Final Repo DIP Order (.3); complete witness preparations (1.5); participate in settlement discussion with N. Peterman and others regarding possible committee settlement (.5); phone call with L. Macksoud regarding Cash Flow DIP presentation (.9).

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Date	Timekeeper	Hours	Amount	Task	Narrative
08/01/22	E. Smith	1.70	1,742.50	B230	Reviewed and prepared correspondence regarding Freddie Mac settlement term sheet revisions and revised Freddie Mac term sheet (0.7); reviewed correspondence regarding terms of the Section 559/lift stay order requested by Consumers Bank and conferred with L. Macksoud regarding same (0.7); confer with FGMC, A. Samples and T. Ramm, FTI team, T. Meerovich, and Dentons team, T. Myron, regarding remaining open items in 559 order negotiations (0.3).
08/01/22	C. O'Leary	2.40	2,040.00	B230	Review/analyze revised BSI LOI and exchange correspondence re: the same (0.4); preparation of Amendment No. 2 to JSACA and exchange correspondence re: the same (0.6); review/analyze 559 Order and exchange correspondence re: the same (0.4); exchange correspondence re: JVB remittance from Signature bank account (0.4); review/analyze objections and responsive pleadings in advance of second day hearings (0.6).
08/01/22	E. Smith	0.80	820.00	B230	Reviewed and prepared correspondence regarding further revisions to drafts of final financing orders; reviewed witness declaration and related material to prepare for August 2nd final hearing on financing, retention and cash collateral matters.
08/01/22	E. Smith	0.30	307.50	B230	Confer with FGMC finance and treasury team, S. De Castro, regarding turn over of segregated subservicer remittances to pre-petition repo warehouse provider.
08/01/22	S. Maizel	0.50	485.00	B230	Zoom conference with M. Powers, N. Peterman, etc. re pending issues related to DIP Facilities.
08/01/22	S. Maizel	1.70	1,649.00	B230	Zoom call with T. Meerovich, C. Montgomery, etc. re preparation for hearing on DIP Facilities.
08/01/22	S. Maizel	3.00	2,910.00	B230	Analyze potential settlement options with UCC and Cash Flow DIP Lender re DIP Facilities (1.9); office conference with T. Moyron re same (1.1).
08/01/22	S. Maizel	0.50	485.00	B230	Zoom conference with M. Schwarzmman, N. Peterman, etc. re financing issues.

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08/01/22	S. Maizel	1.50	1,455.00	B230	Zoom conference with T. Meerovich, W. Nolan, C. Montgomery, etc. re preparation for hearing on DIP Facilities and UCC objection to motion re DIP Facilities.
08/01/22	S. Maizel	0.80	776.00	B230	Zoom conference with M. Schwarzmman, N. Peterman, T. Moyron, etc. UCC issues with DIP Facilities motions (.5); telephone conference with W. Nolan re same (.1); telephone conference with Mark Powers re same (.2).
08/01/22	T. Moyron	1.40	1,106.00	B230	Zoom call with T. Meerovich, C. Montgomery, et al., re preparation for hearing on DIP Facilities.
08/01/22	T. Moyron	0.50	395.00	B230	Zoom conference with M. Schwarzmman, N. Peterman, et al., re financing issues.
08/01/22	T. Moyron	0.50	395.00	B230	Zoom conference with M. Powers, N. Peterman, et al, re pending issues related to DIP Facilities.
08/01/22	D. Cook	7.60	4,712.00	B230	Revise DIP Reply in connection with language regarding lender corporate structure (.3); revise DIP Reply in connection with PSZJ comments (1.2); analyze DIP Reply for revisions needed in preparation for filing (2.1); analyze Supplemental Meerovich Declaration in connection with preparation of DIP Reply (.6); analyze case law in support of same with respect to DIP interest and fees (.7); telephone conferences with T Moyron regarding DIP Reply (.2); telephone conferences with T Moyron regarding UCC settlement proposal (.3); draft settlement email to be sent to UCC in connection with same (.2); telephone conference with T Moyron and S Maizel regarding DIP milestones (.1); analysis regarding DIP milestones (.4); email correspondence with FTI regarding DIP reply edits (.2); email correspondence with Debtors' legal professionals regarding same (.5); email correspondence with lenders' counsel regarding same (.1); analysis regarding entire fairness standard in Delaware (.7).
08/01/22	T. Moyron	1.40	1,106.00	B230	Analyze supplemental declaration from T. Meerovich and exhibits (.8); analyze emails from M. Hyland, et al. (.6).
08/01/22	T. Moyron	1.50	1,185.00	B230	Zoom conference with T. Meerovich, W. Nolan, C. Montgomery, et al., re preparation for hearing on DIP Facilities and UCC objection to motion re DIP Facilities.

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Date	Timekeeper	Hours	Amount	Task	Narrative
08/01/22	T. Moyron	0.80	632.00	B230	Zoom conference with M. Schwarzmann, S. Maizel, et al., re UCC issues with DIP Facilities motions (.5); telephone conference with W. Nolan re same (.1); telephone conference with Mark Powers re same (.2).
08/01/22	T. Moyron	2.30	1,817.00	B230	Analyze potential settlement options with cash flow DIP lender and Committee re DIP facilities (1.2); meetings with S. Maizel re same (1.1).
08/02/22	T. Moyron	0.20	158.00	B230	Call with S. Maizel re DIP financing.
08/02/22	C. O'Leary	1.90	1,615.00	B230	Plan/prepare for/attend hearing re: various pending motions (1.6); review/analyze settlement outline and exchange correspondence re: the same (0.3).
08/02/22	C. O'Leary	1.90	1,615.00	B230	Review/analyze BSI LOI and exchange correspondence re: the same (0.6); plan/prepare for/conduct TC T. Moyron, FTI and FGMC re: asset sale and exchange correspondence re: the same (0.8); exchange correspondence re: FGMC/Customers settlement and review Customers UCC (0.3); exchange correspondence re: TCB Notice of Liquidation (0.2).
08/02/22	D. Cook	1.90	1,178.00	B230	Attend hearing on final DIP relief (1.5); analysis of Cash Flow DIP reply with respect to same (.4).
08/02/22	S. Schrag	2.10	1,365.00	B230	Prepare for and attend Hearing on Final Orders related to First Day Motions.
08/02/22	C. Montgomery	6.30	7,623.00	B230	Prepare for hearing and matters related to DIP hearing (2.5.); phone call with T. Moyron regarding Debtors opening statement (.2); phone call with T. Meerovich regarding conduct during hearing (.1); participate in Zoom hearing on Second Day matters (1.8); communications with P. Partee regarding further tweak to Repo Order (.3); communications with S. Maizel, T. Moyron, L. Macksoud and L. Jones regarding hearing developments (.1); refresh and alter hearing preparations (.4); review draft settlement proposal from Cash Flow DIP lender to Debtors and UCC (.1); review cash management order as entered (.1); call T. Meerovich post hearing (.1); call T. Moyron, L. Macksoud and L. Smith regarding debrief and next steps (.5); communications from E.L. Smith regarding JVB request for remittance (.1).

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08/02/22	S. Maizel	0.30	291.00	B230	Zoom conference with M. Schwarzmann, N. Peterman, etc. re potential settlement of UCC objections to DIP Facilities motions.
08/02/22	S. Maizel	0.20	194.00	B230	Telephone conference with T. Moyron re DIP Facilities.
08/02/22	S. Maizel	0.30	291.00	B230	Drafting email to counsel for GNMA re sale of MSRs.
08/03/22	C. Montgomery	6.20	7,502.00	B230	Communications with T. Moyron and C. O'Leary regarding Greenberg Traurig request for return of pledged cash collateral (1.7); communications with O. Alaniz and T. Moyron regarding revisions to Repo DIP Order and Cash Flow DIP Order (.7); participate in Zoom call with C. O'leary, L. Smith and L. Macksoud regarding Customers Bank Excess proceeds remittances (.6); begin draft response to Greenberg request for Customer Funds (.9); participate in Teams call with N. Peterman, B. Oppenheimer M. Schwartzman, T. Moyron and L. Smith regarding Customers Bank MRA proceeds (.8); participate in Teams call with T. Meerovich, T. Moyron and others regarding DIP Lenders position on Customers MRA proceeds (.5); phone call with T. Moyron regarding update from Customers (.2); review committee changes to the Cash Flow DIP Order (.1); participate in Zoom call with L. Macksoud regarding Flagstar lift stay request and Cash Flow DIP orders (.5); communications from Committee counsel regarding changes to Cash FLOW DIP Order (.2).
08/03/22	C. O'Leary	1.90	1,615.00	B230	Review/analyze Customers MRA and Loan Agreement re: excess proceeds (0.6); exchange correspondence re: TCB Notice of Liquidation (0.6); preparation of JSACA Amendment No. 2 and exchange correspondence re: the same (0.7).
08/03/22	C. O'Leary	2.20	1,870.00	B230	Exchange correspondence re: BSI LOI (0.3); plan/prepare for/conduct TC C.Montgomery and L. Smith re: Customers liquidation and setoff rights (1.3); preparation of response to PIMCO/GT re: Customers liquidation process (0.3); exchange correspondence re: Barclays Repo Guaranty (0.3).

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08/03/22	E. Smith	1.80	1,845.00	B230	Attended update call with cash flow DIP lender and counsel, N. Pederman, FGMC, T. Ramm, FTI, T. Meerovich, and Dentons, T. Moyron and S. Maizel (1.5); confer with T. Moyron regarding further developments (.3).
08/03/22	E. Smith	0.40	410.00	B230	Confer with counsel for loan servicer STS, J. Renert, regarding response to warehouse providers requesting servicing assistance directly from the servicer.
08/03/22	T. Moyron	3.40	2,686.00	B230	Analyze issues and emails related to Customers and TCB (.2); correspond with L. Macksoud re DIP milestones (.1); analyze issues related to Flagstar stipulation and waivers (.4) and correspond with L. Macksoud re same (.6); correspond with L. Macksoud re same (.1); analyze issues related to Customers (.9) and prepare email to N. Peterman, et al., re same (.1), Committee comments to DIP order (.3); analyze email from TCB counsel re amendment to JSACA (.1); analyze issues related to Committee comments and cash flow DIP order and analyze emails from J. Schwartz, et al., re same (.6).
08/04/22	C. Montgomery	1.00	1,210.00	B230	Communications with T. Moyron and M. Schartzman regarding Customers Bank calculations (.1); communications with T. Moyron and C. O'Leary regarding TCB calculations and Rushmore remittances (.1); communications with L. Macksoud regarding DIP Repo Order (.1); communications with E. Schnabel regarding Customers Bank comments on Cash Flow DIP Order (.1); communications with L. Macksoud, E. Howe, M. Powers and P. Partee regarding Cash Flow DIP Order (.1); participate in zoom call with J Taylor and S Warren regarding adequate assurance stipulation (.5).
08/04/22	C. O'Leary	0.90	765.00	B230	Exchange correspondence re: TCB-FNMA remittances (0.3); exchange correspondence re: BSI LOI and asset sale motion (0.3); exchange correspondence re: JSACA and ongoing Agency discussions (0.3).
08/04/22	T. Moyron	0.30	237.00	B230	Analyze matters related to confidentiality agreement and redactions re Committee.
08/04/22	T. Moyron	0.30	237.00	B230	Conference call with T. Ramm regarding Customers and other matters.

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08/04/22	T. Moyron	0.70	553.00	B230	Analyze matter related to Flagstar and related questions related to motion, stipulation and procedure (.3); call with L. Macksoud (.1) and M. Caloway (.1) re same; and analyze email from counsel for Flagstar, et al., re same (.2).
08/04/22	T. Moyron	0.60	474.00	B230	Call with counsel for FNMA (S. Warren and J. Taylor), senior in-house counsel for FNMA, L. Macksoud et al., re stipulations and potential resolution through draft term sheet (.5); analyze follow up email from J. Taylor (.1).
08/04/22	E. Smith	0.80	820.00	B230	Prepare for and attend call with FNMA and Dentons team, T. Moyron.
08/04/22	E. Smith	0.40	410.00	B230	Reviewed second day hearing-driven revisions to final DIP order; reviewed revisions to GSE settlement term sheet.
08/05/22	E. Smith	0.50	512.50	B230	Attention to loan agreement interest rate questions from FTI team (.1); attended update call with representatives of cash flow DIP lender, M. Schwartzman; FGMC, D. Oien, FTI team, T. Meerovitch, and Dentons team, T. Moyron (.4).
08/05/22	C. Montgomery	1.30	1,573.00	B230	Communications with L. Macksoud, T. Moyron, and N. Peterman regarding DIP Lender fees and timing of payment under Cash Flow DIP Order (.3); DiP Lender update Teams call with FTI, Greenberg, Dentons call including M. Schwartzman, T. Meerovich, T. Moyron and others (1.0).
08/05/22	C. O'Leary	0.60	510.00	B230	Exchange correspondence re: Ginnie Mae NOV and program status (0.3); exchange correspondence re: TCB Notice of Liquidation and Rushmore's reconciliation (0.3).
08/05/22	T. Moyron	1.30	1,027.00	B230	Communications with C. Montgomery, T. Meerovich, et al., regarding DIP Lender fees and timing of payment under Cash Flow DIP Order (.3); Teams call with FTI, Greenberg, Dentons call including M. Schwartzman, T. Meerovich, T. Moyron and others (1.0).
08/05/22	T. Moyron	0.20	158.00	B230	Analyze email from M. Schmergel, et al., re GNMA, clarification on background, GNMA's response to FGMC's request.
08/05/22	T. Moyron	0.10	79.00	B230	Analyze email from N. Peterman re invoice.

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08/05/22	T. Moyron	0.20	158.00	B230	Analyze emails from K. Ferrier, et al., regarding notice of liquidation from TCB.
08/05/22	T. Moyron	0.20	158.00	B230	Analyze emails from J. Krasne, et al. re default rate and loan agreement re Customers.
08/05/22	T. Moyron	0.10	79.00	B230	Analyze email from M. Hyland re funded loans.issues.
08/05/22	T. Moyron	0.10	79.00	B230	Analyze email from M. Schwarzmenn re Customers.
08/05/22	T. Moyron	0.40	316.00	B230	Analyze email from S. Warren and FNMA and stipulation (.2); and analyze related issues (.1); and prepare email to G. Miller (.1).
08/05/22	T. Moyron	2.60	2,054.00	B230	Communications with C. Montgomery, T. Meerovich, et al., regarding DIP Lender fees and timing of payment under Cash Flow DIP Order (.3); Teams call with FTI, Greenberg, Dentons call including M. Schwartzman, T. Meerovich, T. Moyron and others (1.0); analyze email from M. Schmergel, et al., re GNMA, clarification on background, GNMA's response to FGMC's request (.2); analyze email from N. Peterman re invoice (.1); analyze emails from K. Ferrier, et al., regarding notice of liquidation from TCB (.2); analyze emails from J. Krasne, et al. re default rate and loan agreement re Customers (.2); analyze email from M. Hyland re funded loans (.1); analyze email from M. Schwarzmenn re Customers (.1); analyze email from S. Warren and FNMA and stipulation (.2); and analyze related issues (.1); and prepare email to G. Miller (.1).
08/06/22	C. Doherty, Jr.	0.10	69.50	B230	Analyze communications regarding employee treatment in bankruptcy.
08/07/22	C. Doherty, Jr.	0.10	69.50	B230	Analyze communications regarding employee treatment in bankruptcy.
08/07/22	C. Montgomery	1.60	1,936.00	B230	Review and suggest revisions to Fannie Mae Adequate Assurance stipulation and schedule 1 (1.5); review and suggest revisions to postpetition payments stipulation (.1).
08/07/22	E. Smith	0.30	307.50	B230	Reviewed and revised drafts of FNMA adequate assurances stipulation, including Schedule 1.

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08/08/22	T. Moyron	0.60	474.00	B230	Analyze matters related to Flagstar and timing (.2) and analyze emails from counsel with Flagstar (.2) and T. Ramm and L. Macksoud (.2).
08/08/22	T. Moyron	0.90	711.00	B230	Call with Freddie and counsel, plus A. Samples, D. Oien, et al.
08/08/22	T. Moyron	0.20	158.00	B230	Call with A. Samples (.1) and T. Meerovich (.1) re KEIP.
08/08/22	T. Moyron	0.30	237.00	B230	Call with M. Schwarzmman, T. Meerovich, et al. regarding status of matters, including agency discussions.
08/08/22	T. Moyron	0.80	632.00	B230	Call with Dentons internal, including S. Maizel, J. Murphy, et al. regarding Freddie, Fannie, and Ginnie.
08/08/22	E. Smith	1.40	1,435.00	B230	Dentons team call to review work streams to address open GSE and Agency issues (.8); review draft of GSE settlement term sheet (.6) .
08/08/22	E. Smith	2.90	2,972.50	B230	Reviewed and revised drafts of FNMA adequate assurances stipulation, including Schedule 1 (1.1); reviewed and discussed agency and bankruptcy research questions with relevant Dentons team members (1.8).
08/08/22	E. Smith	0.20	205.00	B230	Reviewed correspondence regarding warehouse lender claims involving prepetition loan guaranty.
08/08/22	E. Smith	1.70	1,742.50	B230	Reviewed and prepared correspondence with counsel for subservicer, J. Renert, and Dentons team, C. Montgomery and L. Macksoud regarding cash collateral order treatment of warehouse lender demands for asset turnover.
08/08/22	E. Smith	0.20	205.00	B230	Attended status call with representatives of cash flow DIP lender, M. Schwarzmman, FGMC, T. Ramm, FTI, T. Meerovitch, and Dentons team, T. Moyron.
08/08/22	C. O'Leary	2.20	1,870.00	B230	Preparation of MSR Sale Motion and exchange correspondence re: the same (0.8); review/analyze Flagstar motion for relief from automatic stay (0.7); review/analyze FNMA stip re: partial refund of payment (0.3); exchange correspondence re: TCB's direction to Rushmore re: remittances (0.4).

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08/08/22	C. O'Leary	1.20	1,020.00	B230	Exchange correspondence re: JVB's requests to SLS re: servicing transfer (0.4); plan/prepare for/conduct OC T. Moyron and L. Macksoud re: Agency discussions and status (0.8).
08/08/22	S. Maizel	0.30	291.00	B230	Zoom call with M. Scharzmann, FTI, etc. re budget issues.
08/08/22	S. Maizel	1.00	970.00	B230	Zoom call with D. Oien re GNMA issues (.3); revising chart showing GNMA NOV issues (.7).
08/08/22	S. Maizel	0.80	776.00	B230	Zoom call re negotiations with Freddie Mac, Fannie Mae and Ginnie Mae.
08/08/22	S. Maizel	1.50	1,455.00	B230	Zoom call with Lee Smith and other Capital Market attorneys re GNMA issues (.5); research re application of section 525 to GNMA (1.0).
08/08/22	T. Moyron	0.50	395.00	B230	Correspond with K. Ziman, et al., re BSI and SLS (.2), and correspond with T. Ramm, et al., at FGMC re same (.3).
08/08/22	T. Moyron	0.10	79.00	B230	Correspond with A. Samples re FNMA.
08/08/22	T. Moyron	0.80	632.00	B230	Analyze open matters related to FNMA, including adequate assurance stipulation and schedule (.3), stipulation related to deposit and account transfer (.2) and term sheet (.3).
08/08/22	T. Moyron	0.10	79.00	B230	Analyze emails from M. Schwarzmman re application of loan funds and other issues.
08/08/22	T. Moyron	0.30	237.00	B230	Analyze open items related to Freddie documents.
08/08/22	T. Moyron	0.20	158.00	B230	Analyze J. Krane, et al., emails regarding Flagstar loans serviced by Rushmore.
08/08/22	T. Moyron	0.30	237.00	B230	Analyze GNMA issues and related research issues.
08/08/22	T. Moyron	0.20	158.00	B230	Analyze P. Moak, et al., emails re call to discuss open issues.
08/08/22	T. Moyron	0.10	79.00	B230	Correspond with O. Alaniz re 341 meeting.
08/08/22	T. Moyron	0.20	158.00	B230	Analyze T. Ramm, et al., emails regarding JVB.
08/08/22	S. Schrag	0.10	65.00	B230	Confer with T. Moyron and S. Maizel regarding issue related to TCB.

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08/08/22	C. Montgomery	2.60	3,146.00	B230	Communications with E.L. Smith and G. Miller regarding FHMA adequate assurance stipulation and schedule 1 (.7); communications with T. Moyron and L. Macksoud regarding JVB issues under 559 and servicers (.1); participate in Teams call with T. Meerovich, M. Schwartzman, T. Moyron, S. Maizel and others regarding Debtors and DIP lender meeting (.4); communications with E.L. Smith and C. O'Leary regarding SLS compliance with JVB payments direction (.1); further review and suggested revisions to Fannie adequate assurances stipulation (.4); zoom call with T. Moyron, E.L. Smith and others regarding agency settlements (.7); communications with E. Howe regarding draft Customers Guaranty stipulation (.1); communications with K. Ferrier regarding Rushmore response to Flagstar lift stay motion (.1).
08/09/22	C. Montgomery	6.40	7,744.00	B230	Communications with L. Macksoud, T. Moyron, A. Samples and T. Ramm regarding Flagstar waivers and cooperation (.4); review Greenberg draft Customers Stipulation and suggest revisions after research regarding same (5.4); review T. Ramm comments regarding Flagstar (.1); communications regarding FNMA stipulations (.1); communications with T. Moyron regarding Greenberg Customers stipulation draft (.4).
08/09/22	E. Smith	2.40	2,460.00	B230	Review and revise draft of 9019 motion (1.6); attend call with FGMC, D. Oien, and Dentons team, S. Schrag, regarding correction and refunds of closing cost overcharges to consumer borrowers (.8).
08/09/22	E. Smith	1.30	1,332.50	B230	Review and advise on provisions of pre-petition working capital loan agreement.
08/09/22	E. Smith	1.70	1,742.50	B230	Confer with FGMC, A. Samples, D. Oien and T. Ramm, FTI, T. Meerovich, and Dentons teams, T. Moyron, regarding GSE settlement term sheet preparation (1.2); review and prepare correspondence regarding purchase and sale agreement for MSR transfers (.5).
08/09/22	T. Moyron	0.10	79.00	B230	Analyze emails from M. Hyland and M. Schwarzmman re funding request.

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08/09/22	T. Moyron	0.10	79.00	B230	Analyze ROR filed by Freddie Mac in response to Flagstar motion.
08/09/22	T. Moyron	0.10	79.00	B230	Analyze email from G. Zhu re Draft A&R guarantees.
08/09/22	T. Moyron	0.30	237.00	B230	Analyze Customers stipulated stay relief order and proposed comments and redline.
08/09/22	T. Moyron	0.30	237.00	B230	Meeting with O. Alaniz, P. Omar, et al. re status of documents.
08/09/22	T. Moyron	0.40	316.00	B230	Conference call with T. Ramm regarding Flagstar, GSEs, and other matters.
08/09/22	T. Moyron	1.80	1,422.00	B230	Participate in meeting with J. Feldsher, T. Ramm, T. Meerovich, et al., regarding motion and resolution related to Flagstar loans and mechanics and bid on loans on Repo line (.5); analyze order and additional language and prepare language and analyze updated language (.7); correspond with T. Ramm, et al., regarding Flagstar motion, orders and related matters (.6).
08/09/22	C. O'Leary	2.80	2,380.00	B230	Review/analyze Customers Stay Relief stipulation and exchange correspondence re: the same (0.6); plan/prepare for/conduct TC Reed Smith re: Freddie term sheet (0.4); review/analyze Freddie term sheet (0.3); exchange correspondence re: MSR sale motion (0.6); review/analyze BSI Purchase and Sale Agreement and exchange correspondence re: the same (0.9).
08/09/22	S. Maizel	1.80	1,746.00	B230	Zoom conference with A. Samples, D. Oien, FTI, etc. re Fannie Mae term sheet, and other pending issues (1.5); review and respond to emails re revising FNMA Term Sheet (.3).
08/09/22	T. Moyron	0.50	395.00	B230	Conference call with N. Peterman regarding various updates related to Customers, GSEs, MSR sae, and other matters.
08/09/22	T. Moyron	0.90	711.00	B230	Conference call with S. Maizel regarding details related to term sheets and 9019 motions re Freddie, Fannie, etc.
08/09/22	T. Moyron	0.40	316.00	B230	Analyze issues related to transfer of funds to TCB, (.2); analyze reimbursement and interest issues re Customers (.2).

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08/09/22	T. Moyron	1.20	948.00	B230	Analyze email from D. Oien re BSI PSA (.1); prepare emails to L. Smith, et al., regarding review and next steps (.3); analyze purchase and sale agreement (.4); conference call with D. Oien regarding timing of review and related matters (.2); analyze email from A. Samples re same (.1); analyze email from D. Oien attaching comments (.1).
08/09/22	T. Moyron	0.40	316.00	B230	Call with Fannie regarding stipulation, term sheet, and related matters.
08/09/22	T. Moyron	0.90	711.00	B230	Call with T. Meerovich, S. Maizel, M. Litvak and L. Jones re KEIP and related matters.
08/09/22	T. Moyron	2.00	1,580.00	B230	Analyze FNMA term sheet (.2); prepare emails to A. Samples, et al., re same (.2); meeting with A. Samples, D. Oien, S. Maizel, et al. re Fannie term sheet and related matters (1.5); analyze email from T. Meerovich re same (.1).
08/10/22	E. Smith	0.50	512.50	B230	Attended catch up call with cash flow DiP lender and counsel, M. Pederson, FGMC, A. Samples, FTI, T. Meerovich, and Dentons, T. Moyron.
08/10/22	S. Maizel	0.10	97.00	B230	Review and respond to emails re TCB letter of credit.
08/10/22	S. Maizel	0.50	485.00	B230	Zoom conference with M. Schwarzmans, T. Meerovich, T. Moyron, etc. re pending issues.
08/10/22	T. Moyron	0.10	79.00	B230	Prepare email to counsel for Flagstar re order.
08/10/22	T. Moyron	0.60	474.00	B230	Analyze limited objection and prepare comments thereto, and analyze updated limited objection.
08/10/22	T. Moyron	1.30	1,027.00	B230	Correspond with C. O'Leary, et al. settlement agreement re Freddie (.3) and analyze matters related to settlement agreement, Freddie Guide, etc. (.3); analyze and prepare comments to motion and declaration (.7).
08/10/22	T. Moyron	0.10	79.00	B230	Correspond with M. Schwarzmans re updates and times.
08/10/22	T. Moyron	0.30	237.00	B230	Correspond with S. Warren, et al., re FNMA.
08/10/22	T. Moyron	0.10	79.00	B230	Analyze email from C. Montgomery re guarantee.
08/10/22	T. Moyron	0.20	158.00	B230	Analyze proposed order and redline re Flagstar.

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08/10/22	T. Moyron	0.50	395.00	B230	Analyze email from O. Alaniz and related comments to stipulation and schedule (.3); correspond with C. Montgomery re same (.2).
08/10/22	T. Moyron	0.30	237.00	B230	Correspond with A. Samples, counsel to cash flow DIP lender, et al., re A&R Note re funding and wiring.
08/10/22	T. Moyron	0.10	79.00	B230	Prepare email to D. Oien, et al., re Freddie Mac term sheet.
08/10/22	S. Schrag	0.20	130.00	B230	Confer with T. Moyron, L. Smith, A. Samples, and S. Maizel regarding A&R note.
08/10/22	C. O'Leary	8.20	6,970.00	B230	Review/analyze initial draft of and preparation of comments to the BSI Purchase and Sale Agreement and exchange correspondence re: the same.
08/10/22	C. O'Leary	2.30	1,955.00	B230	Review/analyze BSI sale deck and exchange correspondence re: the same (0.6); exchange correspondence re: TCB-Rushmore remittances (0.3); Plan/prepare for/conduct TC FGMC (Thomas Ramm and Darien Oien) re: BSI Purchase and Sale Agreement (0.8); review/analyze Maverick Guarantee and exchange correspondence re: the same (0.6).
08/10/22	C. O'Leary	3.00	2,550.00	B230	Review/analyze motion to approve Freddie Mac settlement and exchange correspondence re: the same (0.8); review/analyze BSI Interim Servicing Agreement and exchange correspondence re: the same (0.7); Plan/prepare for/conduct TC L. Harrison and T. Moyron re: BSI Purchase and Sale Agreement (0.8); review/analyze Flagstar lift stay order and exchange correspondence re: the same (0.4); exchange correspondence re: TCB LOCs (0.3).
08/10/22	C. Montgomery	1.20	1,452.00	B230	After 6pm communications with L. Macksoud, K. Ferrier and J. Feldsher re Flagstar motion and Rushmore (.4); review Barclays updated guarantees by Maverick and Repo Guarantor and communications with T. Moyron and D. Oien re same (.4); review Freddie Mac Term sheet and communications with T. Moyron re same (.4).

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08/10/22	C. Montgomery	3.80	4,598.00	B230	Communications with L. Macksoud and T. Ramm regarding Flagstar settlement (.1); communications with L. Harrison, J. Murphy regarding Freddie Mac Settlement (.2); review updated Bravo Guaranty and communications with T. Moyron regarding same (.4); communications with T. Moyron regarding PIMCO /Customers distribution agreement (.1); communications with S. Warren, T. Moyron regarding adequate assurance stipulation (.1); zoom call with T. Moyron, S. Maizel regarding Greenberg/Customers stipulation (.4); follow up communications with S. Maizel, T. Moyron re same and update draft (.4); participate in zoom call with FGMC, DIP Lender, FTI including M. Schwarzman, T. Meerovich, T. Moyron, A. Samples (.5); communications with E. Howe regarding Customers- Guarantor stipulation(.5); communications with T. Moyron regarding Fannie Mae updated adequate assurance stipulation (.6); review Flagstar stipulation revisions and phone call with L. Macksoud regarding same (.5).
08/10/22	T. Moyron	0.50	395.00	B230	Zoom conference with M. Schwarzmann, T. Meerovich, S. Maizel, et al., re pending issues.
08/11/22	C. Montgomery	2.90	3,509.00	B230	Zoom call with T. Moyron, S. Maizel, G. Miller regarding Freddie settlement and adequate assurances stipulation (.4); communications with S. Warren and T. Moyron regarding Fannie settlement and adequate assurances stipulation (.2); participate in Zoom call with A. Samples, T. Moyron, T. Meerovich and D. Oien regarding Freddie and Fannie proposed settlements (.8); Zoom call with O. Alaniz, L. Smith, G. Miller regarding Freddie Term Sheet (.5); follow up call with T. Moyron regarding sale morion definition in Freddie Term sheet (.5); follow up communications with L. Harrison, G. Miller, C. O'Leary, T. Moyron regarding same (.5).
08/11/22	C. O'Leary	3.20	2,720.00	B230	Review/analyze revised Purchase and Sale Agreement; preparation of Purchase and Sale Agreement (2.8); exchange correspondence re: TCB LOCs (0.4).

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08/11/22	C. O'Leary	2.20	1,870.00	B230	Plan/prepare for/conduct TC FGMC and T. Moyron re: BSI Purchase and Sale Agreement (1.3); review/analyze Fannie term sheet and exchange correspondence re: the same (0.3); review/analyze Freddie term sheet and exchange correspondence re: the same (0.6).
08/11/22	T. Moyron	1.80	1,422.00	B230	Analyze redline of Freddie Mac term sheet and related issues, including MSA Sale (.9); correspond with counsel for Freddie Mac (.2); correspond with G. Miller, et al., regarding changes to Freddie Mac term sheet (.4); conference call with counsel for Freddie Mac re term sheet (.3).
08/11/22	E. Smith	2.30	2,357.50	B230	Reviewed Freddie Mac settlement term sheet and FNMA adequate assurances stipulation and schedule (.3); confer with FGMC, A. Samples, D. Oien, FTI, T. Meerovich, and Dentons team, T. Moyron, regarding term sheet comments from Freddie Mac (.8); confer with counsel for Freddie Mac regarding settlement term sheet and made further revisions to the term sheet (1.0).
08/11/22	T. Moyron	1.30	1,027.00	B230	Correspondence and calls with L. Macksoud, et al., Flagstar and Rushmore and relater order and issues (.7); correspondence with S. Warren, T. Meerovich, N. Peterman, et al, re FNMA (.6).
08/11/22	T. Moyron	0.80	632.00	B230	Conference call with A. Samples, D. Oien, C. Montgomery, et al., regarding Agency term sheets.
08/11/22	T. Moyron	0.50	395.00	B230	Conference call with C. Montgomery, et al., re Freddie Term Sheet.
08/11/22	T. Moyron	1.00	790.00	B230	Conference call with C. O'Leary, et al., regarding outstanding issues on BSI purchase and sale agreement.
08/12/22	T. Moyron	0.40	316.00	B230	Prepare email to T. Cains re timing of Freddie settlement and filing (.1); correspond with counsel for Freddie Mac (P. Moak), et al., re term sheet (.3).

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08/12/22	T. Moyron	1.80	1,422.00	B230	Conference call with A. Samples, W. Smith, et al., regarding FNMA term sheet (.5); correspond with A. Samples, et al., regarding FNMA (.2); analyze emails from N. Sombuntham and included analysis re FNMA (.4); analyze FNMA term sheet (.4); call with T. Ramm regarding FNMA and related issues (.3).
08/12/22	T. Moyron	4.30	3,397.00	B230	Conference call with S. Maizel, L. Smith, et al., regarding Freddie Term Sheet and 9019 motion and redline (1.5); call with A. Samples, et al., regarding Freddie Term Sheet and outstanding issue (.4); conference call with Freddie and counsel, A. Samples, et al. regarding term sheet, MSR sale, and related issues (.8); analyze updated 9019 motion and redline and provide comments thereto (.9); correspond with G. Miller re same and declaration (.3); correspond with O. Alaniz regarding language in term sheet (.4).
08/12/22	T. Moyron	0.20	158.00	B230	Prepare emails to N. Peterman regarding documents related to plan, sale, and settlement.
08/12/22	T. Moyron	0.10	79.00	B230	Prepare email to S. Warren, et al., re Debtors' counter.
08/12/22	E. Smith	3.10	3,177.50	B230	Confer with counsel for Freddie Mac and Dentons team, T. Moyron and S. Maizel, regarding open items in settlement term sheet (.4); review and confer with Dentons team, T. Moyron and S. Maizel, regarding Freddie Mac settlement term sheet and Freddie Mac comments on 9019 motion and proposed order (2.6); confer with FGMC, A. Samples, FTI, and Dentons team, T. Moyron, regarding FNMA stipulation regarding adequate assurances (.1).
08/12/22	S. Maizel	4.90	4,753.00	B230	Zoom conference with T. Moyron, C. Montgomery, etc. re negotiations with Freddie Mac (1.0); zoom conference with T. Meerovich, A. Samples, etc. re same (.8); zoom conference with Bill Lyons, Freddie Mac, counsel for Freddie Mac, FTI, etc. re same (.8); multiple calls with T. Moyron re same (.4); review and revise 9019 motion re Freddie Mac settlement (1.4); review and respond to emails re Freddie Mac settlement (.5).

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08/12/22	S. Maizel	1.00	970.00	B230	Zoom conference with A. Samples, T. Meerovich, etc. re Fannie Mae issues (.5); telephone conference with T. Moyron re same (.1); review and respond to emails re Fannie Mae issues (.4).
08/12/22	C. O'Leary	2.80	2,380.00	B230	Preparation of BSI Purchase and Sale Agreement and exchange correspondence re: the same (1.6); TC Thomas Ramm re: EBO provisions and exchange correspondence re: the same (0.3); preparation of sale motion and exchange correspondence re: the same (0.9).
08/12/22	C. O'Leary	1.80	1,530.00	B230	Plan/prepare for/conduct TC Freddie Mac re: sale motion and PSA (1.2); preparation of comments to BSI Interim Servicing Agreement and exchange correspondence re: the same (0.4); exchange correspondence re: Tysons Corner lease LOC (0.2).
08/12/22	C. O'Leary	3.10	2,635.00	B230	Review/analyze Freddie's comments to 9019 motion and OC T. Moyron re: the same (1.4); preparation of comments to Maverick Guarantee and exchange correspondence re: the same (0.6); review/analyze BSI's comments to PSA and exchange correspondence re: the same (1.1).
08/13/22	C. O'Leary	0.20	170.00	B230	Exchange correspondence re: BSI PSA.
08/14/22	C. Montgomery	1.50	1,815.00	B230	Zoom call with S. Maizel, E.L. Smith and later joined by G Miller and T. Moyron regarding responses to Greenberg challenges to Fannie and Freddie settlements (1.5).
08/14/22	C. O'Leary	1.10	935.00	B230	Preparation of Sale Motion and exchange correspondence re: the same (0.8); exchange correspondence re: Freddie term sheet (0.3).
08/14/22	E. Smith	1.90	1,947.50	B230	Reviewed cash flow DIP lender questions regarding GSE settlement term sheet (.4); confer with Dentons team, S. Maizel, T. Moyron regarding responses to questions regarding GSE claim settlement discussions from cash flow DIP lender (1.5).
08/14/22	T. Moyron	0.30	237.00	B230	Analyze motion to shorten time and additional language regarding timing and marketing (.2); prepare email to M. Caloway re same (.1).
08/14/22	T. Moyron	0.60	474.00	B230	Analyze budget, FTI weekly reporting documents from 8/11 and related matters.

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08/15/22	T. Moyron	0.10	79.00	B230	Prepare email to M. Power and M. Indelicato regarding motion to shorten re 9019 motion.
08/15/22	T. Moyron	0.50	395.00	B230	Zoom meeting with G. Miller, et al., re Freddie's comments to 9019 motion, term sheet and other documents.
08/15/22	T. Moyron	0.60	474.00	B230	Analyze updated term sheet (.1); prepare email to O. Alaniz regarding date related to entry of sale order (.1); analyze updated 9019 motion and order and redline (.4).
08/15/22	T. Moyron	0.40	316.00	B230	Zoom meeting with P. Moak, C. Montgomery, et al., regarding matters related to 9019 motion and motion to approve stipulation re Freddie Mac agreement.
08/15/22	C. O'Leary	4.90	4,165.00	B230	Preparation of comments to BSI Purchase and Sale Agreement and exchange correspondence re: the same (2.6); review/analyze comments to sale motion, preparation of sale motion and exchange correspondence re: the same (2.3).
08/15/22	C. O'Leary	1.80	1,530.00	B230	Plan/prepare for/conduct TC T. Moyron and L. Harrison re: Freddie's comments to sale motion (0.8); review/analyze Fannie's comments to sale motion (0.4); plan/prepare for/conduct Tc T. Moyron and G. Miller re: Freddie Mac stipulation and 9019 motion (0.6).
08/15/22	C. O'Leary	2.20	1,870.00	B230	Plan/prepare for/conduct TC Greenberg, Bravo and FGMC re: BSI PSA and sale motion (1.0); exchange correspondence with L. Harrison re: Meerovich declaration (0.2); plan/prepare for/conduct TC Creditors Committee re: BSI PSA and exchange correspondence re: the same (0.6); OC L. Harrison re: Sale Motion and Declaration in Support (0.4).
08/15/22	T. Moyron	0.20	158.00	B230	Correspond with M. Hyland, et al., re Multibank.
08/15/22	T. Moyron	0.20	158.00	B230	Analyze T. Ramm, et al., emails re Customers Bank.
08/15/22	T. Moyron	0.20	158.00	B230	Analyze issues related to repurchase obligations and requirements of Freddie stipulation.
08/15/22	T. Moyron	0.20	158.00	B230	Call with L. Jones and T. Cairns re motion to approve stipulation and related considerations regarding local rule requirements re Freddie.

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08/15/22	T. Moyron	0.50	395.00	B230	Call with O. Alaniz, G. Miller, et al., regarding 9019 motion, motion to approve stipulation, and sequencing and procedures.
08/15/22	T. Moyron	0.40	316.00	B230	Further analysis of Freddie Mac comments on 9019 motion and term sheet.
08/15/22	T. Moyron	0.60	474.00	B230	Analyze FTI's responses on questions posed by GT and cash flow DIP lender (.3); correspond with T. Ramm re same (.2); and prepare email to cash flow DIP lender regarding same (.1).
08/15/22	T. Moyron	1.90	1,501.00	B230	Analyze updated 9019 motion and term sheet and outstanding issues (1.2); correspond with Freddie's counsel re same (.4); and correspond with G. Miller re same (.3).
08/15/22	T. Moyron	0.20	158.00	B230	Correspond with M. Caloway re motion to approve stipulation.
08/15/22	T. Moyron	1.00	790.00	B230	Zoom meeting with N. Peterman, cash flow DIP lender, T. Meerovich, A. Samples, et al., re BSI & related Agency discussion.
08/15/22	T. Moyron	0.10	79.00	B230	Analyze email from A. Samples re signature re Freddie.
08/15/22	C. Montgomery	1.20	1,452.00	B230	Phone call with S. Maizel regarding response to Greenberg questions (.2); communications with C.O'Leary regarding additional Greenberg questions (.3); review FTI settlement comparison analysis (.4); communications with T. Ramm and T. Moyron regarding Customers loan pricing LOIs and impact on settlement Analysis (.3).
08/15/22	E. Smith	1.20	1,230.00	B230	Confer with cash flow DIP lender, M. Schwarzmans, and counsel, N. Pederman, FGMC, T. Ramm, FTI, T. Moyron, and Dentons team, T. Moyron, regarding GSE servicing and MSR sale process updates.
08/15/22	E. Smith	0.50	512.50	B230	Confer with Dentons team, T. Moyron, regarding GSE comments on settlement term sheet, stipulation and 9019 motion status.
08/16/22	C. O'Leary	2.40	2,040.00	B230	Exchange correspondence re: US Trustee;s inquiries related to Sale Motion and BSI PSA (1.6); review/analyze Fannie Guide with respect to Buy Up payments and exchange correspondence re: the same (0.8).

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08/16/22	C. O'Leary	2.30	1,955.00	B230	Review/analyze Freddie's comments to Sale Order and exchange correspondence re: the same (1.2); review/analyze comments to 9019 motion and exchange correspondence re: the same (0.4); review/analyze correspondence re: Rushmore MSR Sale (0.4); review/analyze Maverick Guaranty and exchange correspondence re: the same (0.3).
08/16/22	T. Moyron	0.10	79.00	B230	Call with counsel for Fannie re negotiations and potential resolution.
08/16/22	T. Moyron	0.50	395.00	B230	Team Meeting with M. Schwarzmann, T. Meerovich, et al., regarding matters related to plan, sales, etc.
08/16/22	T. Moyron	1.40	1,106.00	B230	Analyze updated comments from Freddie on 9019 motion and order (.8); analyze updated motion and redline (.6).
08/16/22	T. Moyron	0.50	395.00	B230	Teams meeting with A. Samples, D. Oien and T. Meerovich re resolution of outstanding issues with Freddie.
08/16/22	T. Moyron	0.60	474.00	B230	Conference call with O. Alaniz, et al., al. re Freddie documents and status.
08/16/22	T. Moyron	0.20	158.00	B230	Correspond with A. Samples re Freddie Mac and status of agreement.
08/16/22	T. Moyron	0.70	553.00	B230	Analyze further redlines and comments from Freddie Mac re sale order, term sheet, 9019 motion.
08/16/22	S. Maizel	1.90	1,843.00	B230	Zoom conference with counsel for Freddie Mac re settlement issues (.6); analyze revised Freddie Mac documents, including but not limited to sale order, etc. (1.3).

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08/16/22	C. Montgomery	4.50	5,445.00	B230	Communications with P. Moak regarding Freddie Adequate Assurances Stipulation (.1); review draft Freddie Adequate Assurances Stipulation approval motion and revise same (.7); communications with T. Moyron re same (.2); communications with D. Sharma and C. O'Leary regarding Fannie Mae settlement comments (.9); communications with L. Harrison and T. Moyron regarding Freddie settlement and sale order (.1); communications with T. Meerovich and T. Moyron regarding purchased loan liability limit (.4); communications with D. Oien and T. Moyron regarding November 1 transfer date and Freddie settlement (.1); Zoom call with P. Moak, O. Alaniz, S. Maizel, T. Moyron regarding Freddie documentation issues (.6); phone calls with G. Miller regarding Freddie documentation clean up and draft edits to same (.5); phone call from T. Meerovich regarding loan sale proceeds credits (.2); review Freddie final comments on documents (.8); communications with T. Moyron, S. Maizel regarding same (.2).
08/17/22	C. Montgomery	0.60	726.00	B230	Communications with J. Murphy and C. O'Leary regarding Barclays guarantee language (.1); communications with T. Cairns regarding Freddie settlement (.4); communications with G. Miller, L. Harrison and O. Alaniz regarding same (.1).
08/17/22	T. Moyron	1.40	1,106.00	B230	Analyze O. Alaniz emails regarding finalization of 9019 documents, sale order, etc. (.3); prepare emails to O. Alaniz re same (.1); analyze updated sale order (.2); analyze updated 9019 and related document redlines (.4); correspond with L. Harrison (.2) and G. Miller (.2) regarding same.
08/17/22	T. Moyron	0.20	158.00	B230	Prepare email to Buckley advisors, including J. Bellman, regarding call to discuss costs (.1) and analyze follow up emails from K. Ryan, et al., re same (.1).
08/17/22	T. Moyron	0.90	711.00	B230	Teams Meeting with Buckley counsel, T. Meerovich, A. Samples, et al., regarding costs and considerations of reorganization transaction.
08/17/22	T. Moyron	0.10	79.00	B230	Analyze J. John, et al., emails re Multibank.
08/17/22	T. Moyron	0.10	79.00	B230	Correspond with M. Caloway re motions to shorten re Freddie.

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08/17/22	T. Moyron	1.00	790.00	B230	Teams meeting with A. Samples, T. Meerovich, S. Maizel, et al., regarding asset sale strategy and related matters.
08/17/22	T. Moyron	0.40	316.00	B230	Analyze Freddie requests related to releases and indemnification (.2); correspond with T. Cairns, et al., re same (.2).
08/17/22	T. Moyron	0.70	553.00	B230	Correspond with M. Caloway regarding 9019 filings and related exhibits and motion to shorten (.2); conference calls with M. Caloway re same (.2); analyze follow up emails from O. Alaniz regarding signatures and filings re Freddie (2); analyze updated motion to shorten redline (.1).
08/17/22	C. O'Leary	2.20	1,870.00	B230	Review/analyze Order to Shorten Time to Hear Sale Motion and exchange correspondence re: the same (0.4); review/analyze Limited Seller Rep and Warranty Schedule in connection with the Non-QM pool and exchange correspondence re: the same (0.8); exchange correspondence re: DBNTC's pre-petition invoices (0.20); plan/prepare for/conduct TC FGMC re: Rushmore MSRs (0.8).
08/17/22	C. O'Leary	2.50	2,125.00	B230	Exchange correspondence re: NQM asset sale (0.6); OC T. Moyron and C. Montgomery re: NQM Asset Sale (0.4); plan/prepare for/conduct TC FTI, FGMC and T. Moyron re: Asset Sales (1.1); review/analyze MultiBank MSFTA and exchange correspondence re: the same (0.4).
08/18/22	T. Moyron	2.20	1,738.00	B230	Analyze email from counsel for FNMA regarding sale motion, PSA, order and related discovery requests (.2); analyze sections in sale motion, etc., referenced by FNMA and related sections (.3); prepare response to FNMA (.3); correspond with C. O'leary re same (.3); conference call with S. Maizel regarding FNMA communication and response and related matters (.5) and call with S. Maizel and counsel for FNMA (S. Warren) re same (.3); conference call A. Samples re same (.2); prepare emails to A. Samples re same (.1).
08/18/22	C. O'Leary	1.60	1,360.00	B230	Preparation of responses to Fannie Mae re: Sale Motion and exchange correspondence re: the same (0.9); exchange correspondence re: DBNTC pre-petition fees (0.3); exchange correspondence re: Sale Motion and Fannie's objection thereto (0.4).

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08/18/22	T. Moyron	1.60	1,264.00	B230	Analyze issues related to DB (.3); analyze email from D. Shama representing FNMA re BSI sale motion, requests for admission and requests for documents (.2); analyze related issues, motion and PSA and prepare proposed response to counsel re FNMA (.7); prepare correspondence to C. O'Leary re same (.3); analyze email from L. Macksoud re MSFTA re Multibank (.1).
08/19/22	T. Moyron	0.50	395.00	B230	Correspond with C. O'Leary, C. Montgomery, D. Oien and T. Ramm regarding NQM loan sales (.3); communications with C. Montgomery and C. O'Leary regarding TCB request for access to mortgage loans on bill of sale (.2).
08/19/22	C. O'Leary	2.40	2,040.00	B230	Preparation of comments to RAMS rep and warranty proposal (0.4); review/analyze DBNTC invoices and exchange correspondence re: the same (0.4); exchange correspondence re: Ginnie transfer request (0.2); Plan/prepare for/conduct TC FGMC, FTI and T. Moyron re: asset sales (0.8); exchange correspondence re: BSI Bill of Sale (0.3); review/analyze PIMCO NQM term sheet and exchange correspondence re: the same (0.3).
08/19/22	T. Moyron	0.20	158.00	B230	Conference call with S. Warren re potential settlement and inquiry as to FNMA process re future approval (.2).
08/20/22	C. O'Leary	0.70	595.00	B230	Review/analyze PIMCO Non-QM term sheet and exchange correspondence re: the same (0.4); review/analyze Fannie term sheet and exchange correspondence re: the same. (0.3).
08/22/22	C. O'Leary	1.30	1,105.00	B230	Exchange correspondence re: Fannie Mae term sheet and proposal (0.2); exchange correspondence re: DBNTC pre-petition invoices (0.3); plan/prepare for/conduct TC Rushmore and FGMC re: MSR portfolio transfer to BSI. (0.8).
08/22/22	C. O'Leary	1.90	1,615.00	B230	Plan/prepare for/conduct TCs with FTI, FGMC and C. Montgomery re: EBO pools, servicing remittances and exchange correspondence re: the same.
08/22/22	C. O'Leary	1.40	1,190.00	B230	TC FTI and G. Miller re: DBNTC pre-petition invoices (0.4); Review/analyze MSFTA Annexes and exchange correspondence re: the same (1.0).

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08/22/22	T. Moyron	0.50	395.00	B230	Call with C. Montgomery regarding pending matters, including FNMA, remittances, etc.
08/22/22	T. Moyron	0.30	237.00	B230	Analyze emails from T. Meerovich, et al., re reconciliation of servicing remittance and allocation of collections.
08/22/22	T. Moyron	0.20	158.00	B230	Analyze S. Smith, et al., emails regarding Barclays fee statement.
08/22/22	T. Moyron	0.10	79.00	B230	Analyze J. John, et al., emails regarding Multibank.
08/22/22	T. Moyron	0.30	237.00	B230	Correspond with A. Samples, et al., regarding FNMA proposal and call regarding same.
08/22/22	C. Montgomery	5.50	6,655.00	B230	Communications with T. Moyron and T. Meerovich regarding Hunton DIP Repo fees (.2); communications with S. Schrag regarding subtenant ACH return (.2); review Fanny BSI sale order revisions and communication with T. Moyron regarding same (.5); Teams calls regarding MSR allocation including T. Meerovich, A. Samples, and C. O'Leary (1.3); review Mass Mutual agreements and allocation Charts re servicing rights (2.5); communications with T. Moyron regarding same (.3); phone call with T. Moyron regarding MRS allocation (.5).
08/23/22	C. Montgomery	0.30	363.00	B230	Communications with C. O'Leary and G. Miller regarding execution of Barclays MFSTA (.1); communication s with G. Miller, T. Moyron regarding Freddie Mac term sheet (.1); communications with S. Warren and T. Moyron regarding Fannie Settlement Term sheet (.1).
08/23/22	T. Moyron	0.10	79.00	B230	Correspond with M. Indelicato re extension of milestones.
08/23/22	T. Moyron	0.20	158.00	B230	Correspond with T. Meerovich, et al., re Mass Mutual and TIAA.
08/23/22	T. Moyron	0.60	474.00	B230	Prepare email to S. Warren re FNMA (.1); analyze email from S. Warren re discussion and settlement points (.2); prepare email to N. Sombuntham re FNMA (.1); confer with L. Harrison, et al., re sale order re FNMA (.1); prepare email to L. Jones re FNMA hearing timing (.1).

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08/23/22	T. Moyron	1.10	869.00	B230	Conference call with T. Meerovich, A. Samples, et al., regarding FNMA proposal and issues related thereto (.6); call with FNMA advisors, including S. Warren, A. Samples, et al. re FNMA's proposal and inquiries related thereto (.5).
08/23/22	T. Moyron	0.20	158.00	B230	Call with C. Montgomery regarding language changes re allocation of servicing remittance.
08/23/22	C. O'Leary	1.40	1,190.00	B230	Exchange correspondence re: MSFTA and MRA Guaranties (0.4); review/analyze Rushmore acknowledgment agreement and exchange correspondence re: the same (0.3); exchange correspondence re: EBO pool remittances (0.3); review/analyze Fannie's proposed comments to BSI SALE Order and exchange correspondence re: the same (0.4).
08/23/22	C. O'Leary	1.90	1,615.00	B230	Preparation of Rushmore Letter Agreement and exchange correspondence re: the same (1.6); exchange correspondence re: JSACA Amendment (0.3).
08/23/22	T. Moyron	2.10	1,659.00	B230	Zoom meeting with L. Harrison, C. Montgomery and S. Maizel regarding FNMA term sheet, sale order, motion and related timing matters.
08/23/22	S. Maizel	2.70	2,619.00	B230	Zoom conference with A. Samples, T. Meerovich, etc. re Fannie Mae settlement issues (.6); zoom conference with C. Montgomery, L. Harrison, etc. re Fannie Mae issues with BSI sale and settlement (2.1).
08/24/22	C. O'Leary	2.20	1,870.00	B230	Review/analyze JVB Trust Termination Letters and exchange correspondence re: the same (1.1); review/analyze EBO MLPAs and exchange correspondence re: the same (1.1).
08/24/22	C. O'Leary	3.20	2,720.00	B230	Plan/prepare for/conduct telephone conference with FTI and C. Montgomery re: EBO MLPAs (1.2); review/analyze revised SMFTA and exchange correspondence re: the same (0.4); OC C. Montgomery re: EBO MLPAs and exchange correspondence re: the same (0.5); review/analyze DBNTC invoices and CMO and exchange correspondence re: the same (1.1)

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Date	Timekeeper	Hours	Amount	Task	Narrative
08/24/22	T. Moyron	1.40	1,106.00	B230	Conference call with T. Meerovich, Bravo, E. Howe, et al., re Non-QM Loans (.7); call with A. Samples (.2), C. Montgomery and T. Rhamm (.4) and T. Meerovich (.1) regarding same; analyze email from E. Howe regarding same (.1).
08/24/22	T. Moyron	0.50	395.00	B230	Call with N. Peterman, E. Howe, C. Montgomery, S. Maizel, T. Meerovich et al., re application of funds re DIP loan.
08/24/22	T. Moyron	0.50	395.00	B230	Correspond with O. Alaniz regarding call to discuss various (.2); conference call with O. Alaniz re BSI Sale, Freddie term sheet and procedure regarding 9019 and cure matters, if necessary (.3).
08/24/22	T. Moyron	0.20	158.00	B230	Correspond with T. Meerovich, A. Samples, et al., re non-agency portfolio.
08/24/22	T. Moyron	0.20	158.00	B230	Correspond with S. Warren re call re FNMA.
08/24/22	T. Moyron	0.20	158.00	B230	Correspond with E. Howe re excess proceeds from Barclay's repo loans (.1) and analyze related issues (.1).
08/24/22	T. Moyron	0.10	79.00	B230	Correspond with A. Samples re Trust Certificates.
08/24/22	T. Moyron	0.20	158.00	B230	Prepare email to S. Schrag (.1) and analyze related issues re various refunds (.1).
08/24/22	T. Moyron	0.10	79.00	B230	Analyze email from T. Meerovich re FNMA analysis.
08/24/22	T. Moyron	0.20	158.00	B230	Correspond with N. Sombuntham, et al., re GT/Hunton guarantees and MSFTA.
08/24/22	T. Moyron	0.10	79.00	B230	Prepare email to N. Peterman and E. Howe re FNMA settlement.

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Date	Timekeeper	Hours	Amount	Task	Narrative
08/24/22	C. Montgomery	4.70	5,687.00	B230	Communications with T. Moyron and L. Jones regarding Fannie Mae settlement hearing and timing (.1); Teams call regarding Mass mutual loan sales and servicing advances (.9); communications with C. O'Leary regarding Mass Mutual termination provisions (.2); phone call with T. Moyron regarding Fannie order (.1); phone call C. O'Leary regarding Mass Mutual termination impact (.5); Teams call with S. Warren and J. Taylor regarding sale order revisions (.5); revise BSI sale order (.7); Zoom call with E. Howe and N. Mitchell and T. Moyron regarding use of Barclays loan sale proceeds under Mortgage Loan Funding Sublimit (.5); Zoom call with A. Samples, D. Oien, T. Meerovich and T. Moyron regarding Barclays loan sales (.5); further revisions to Fannie sale order language (.7).
08/25/22	C. Montgomery	0.80	968.00	B230	Phone call with B. Clark regarding form of consent to waiver (.1); cash flow DIP lender update call including M. Schwarzman, N. Peterman, A. Samples, T. Meerovich (.7).
08/25/22	C. Doherty, Jr.	0.20	139.00	B230	Review discovery requests from lender and respond to emails regarding same.
08/25/22	T. Moyron	0.20	158.00	B230	Analyze emails from M. Hyland and A. Samples re Weekly Reporting Package.
08/25/22	T. Moyron	0.80	632.00	B230	Conference call with FGMC, Bravo, FTI, including T. Meerovich, N. Peterman, A. Samples, J. Stein, et al.
08/25/22	E. Smith	0.70	717.50	B230	Attended matter status call with cash flow DIP lender representatives and counsel, FGMC, A. Samples, and FTI, T. Meerovich.
08/25/22	C. O'Leary	2.40	2,040.00	B230	TC FGMC, FTI and T. Moyron re: asset sale strategy and exchange correspondence re: the same (1.4); review/analyze final MSFTA and A&R Guaranties and exchange correspondence re: the same (0.6); exchange correspondence re: accrued interest on financing facilities (0.4).
08/25/22	C. O'Leary	1.70	1,445.00	B230	TC C. Montgomery re: EBO MLPAs and remittances (1.1); preparation of comments to BSI Interim Servicing Agreement and exchange correspondence re: the same (0.6).

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Date	Timekeeper	Hours	Amount	Task	Narrative
08/26/22	S. Maizel	0.50	485.00	B230	Zoom conference with counsel for Fannie Mae, etc. re potential settlement.
08/26/22	C. O'Leary	2.90	2,465.00	B230	Preparation of final JSACA Amendment No. 2 and exchange correspondence re: the same (0.6); Exchange correspondence re: BSI Sale Agreement and settlement motions (0.7); Preparation of comments to BSI Interim Servicing Agreement and exchange correspondence re: the same (0.4); Exchange correspondence re: DB pre-petition invoices, CMO and invoice matrix (1.2).
08/26/22	T. Moyron	0.40	316.00	B230	Zoom meeting with N. Peterman, M. Schwarzmman, T. Meerovich, A. Samples, et al., regarding FNMA term sheet.
08/26/22	T. Moyron	0.20	158.00	B230	Correspond with Committee counsel re Freddie Mac call.
08/26/22	T. Moyron	0.10	79.00	B230	Prepare email to T. Meerovich, et al., regarding prepetition payments to Freddie Mac.
08/26/22	C. Montgomery	0.50	605.00	B230	Cash Flow DIP lender call regarding value of Fannie Mae Settlement including M. Schwarzman, N. Peterman, T. Moyron, T. Meerovich (.4); review Fannie Term Sheet and communications with T. Moyron regarding same (.1).
08/27/22	C. O'Leary	0.20	170.00	B230	Exchange correspondence re: 9019 motion and stipulation.
08/28/22	C. O'Leary	1.20	1,020.00	B230	Preparation of Fannie 9019 motion and exchange correspondence re: the same.
08/28/22	C. O'Leary	1.20	1,020.00	B230	Exchange correspondence re: BSI PSA, Sale Motion and Freddie settlement.
08/28/22	T. Moyron	1.20	948.00	B230	Analyze matters related to Freddie Mac, including inquiries from O. Alaniz, PSA, and term sheet.
08/28/22	C. Montgomery	0.30	363.00	B230	Phone call with S. Maizel regarding non-bifurcated payment liability issue.

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Date	Timekeeper	Hours	Amount	Task	Narrative
08/29/22	C. Montgomery	2.40	2,904.00	B230	Review Barclays DIP Master Repurchase Agreement and communications with M. Heyland regarding principal and interest remittances to Barclays (.2); communications with T. Moyron, E. L. Smith, S. Maizel, L. Macksoud, C. O'Leary: regarding Barclays Limited Waiver (.2); communications with T. Moyron regarding Freddie Mac servicing assurances stipulation (.1); communications with T. Moyron regarding FNMA settlement term sheet (.4); communications with T. Moyron regarding Freddie Mac Settlement (.1); draft edits to Fannie Mae Adequate Assurances Stipulation and Schedule 1 (.9); review most recent draft of Fannie Mae term sheet (.1); communications with L. Harrison regarding Freddie Mac order citation (.2); review Fannie updates to proposed sale order (.1); review Ginnie Mae edits to sale order (.1).
08/29/22	T. Moyron	0.40	316.00	B230	Correspond with C. Montgomery, et al. re Barclays Limited Waiver (.2); correspond with C. Montgomery re Freddie Mac servicing assurances stipulation (.2).
08/29/22	T. Moyron	0.10	79.00	B230	Correspond with C. Montgomery re Freddie Mac Settlement.
08/29/22	T. Moyron	0.70	553.00	B230	Analyze FNMA motion and matters related thereto (.5); correspond with G. Miller re same (.2).
08/29/22	T. Moyron	0.90	711.00	B230	Correspond with A. Samples, L. Manning, et al., re prepetition payments to Freddie (.4); review analysis of payments (.1); prepare emails to M. Power re same (.2); analyze correspondence from counsel for Freddie (.2).
08/29/22	E. Smith	0.90	922.50	B230	Reviewed proposed form of POR filing milestone waiver (.3); prepared and reviewed correspondence with FGMC, A. Samples and D. Oien, FTI, T. Meerovich and W. Nolan, and Dentons team, T. Moyron and S. Maizel (.4); prepared correspondence with counsel for Barclays regarding POR milestone waiver (.2).

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Date	Timekeeper	Hours	Amount	Task	Narrative
08/29/22	E. Smith	0.90	922.50	B230	Reviewed draft of promissory note reflecting new advance under cash flow DIP loan (.2); prepared correspondence with FGMC, A. Samples, and FTI, T. Meerovich, regarding size of requested advance (.5); reviewed and prepared correspondence with DIP lender's counsel regarding execution and delivery of new original promissory note (.2).
08/29/22	S. Maizel	1.00	970.00	B230	Zoom call with Freddie Mac counsel, etc. re BSI sale related issues (.4); zoom conference with C. Montgomery, T. Moyron, etc. re Freddie Mac issues (.6).
08/29/22	C. O'Leary	2.30	1,955.00	B230	Preparation of Fannie Mae 9019 motion and exchange correspondence re: the same (1.4); review/analyze limited waiver and exchange correspondence re: the same (0.3); exchange correspondence re: BSI sale agreement and motion (0.6).
08/30/22	C. O'Leary	1.80	1,530.00	B230	Preparation of Rushmore Letter Agreement and exchange correspondence re: the same (0.8); telephone conference with T. Moyron re: Rushmore Letter Agreement (0.3); review/analyze MSFTA Annexes and exchange correspondence re: the same (0.3); review/analyze JVB Notices of Trust Termination and exchange correspondence re: the same (0.4).
08/30/22	C. O'Leary	3.10	2,635.00	B230	Review/analyze BSI PSA and Sale Motion in preparation for motion hearing in Delaware bankruptcy court (1.7); telephone conference with T. Moyron and S. Maizel re: BSI Sale Motion and revised Order (0.7); exchange correspondence re: BSI PSA and Sale Motion (0.7).
08/30/22	S. Maizel	0.60	582.00	B230	Zoom conference re Freddie Mac settlement.
08/30/22	T. Moyron	0.60	474.00	B230	Conference call with M. Power, T. Ramm, S. Maizel and T. Meerovich re prepetition payments to Freddie Mac.
08/30/22	T. Moyron	1.20	948.00	B230	Teams meeting with T. Meerovich, A. Samples, et al. re budget.
08/30/22	T. Moyron	0.60	474.00	B230	Analyze Freddie term sheet re nonbifurcated liability (.4); prepare language re term sheet (.1); pre-prepare email to A. Samples re same (.1).

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Date	Timekeeper	Hours	Amount	Task	Narrative
08/30/22	T. Moyron	0.40	316.00	B230	Analyze emails from B. Oppenheimer, et al., re Loan Note and release of signature (.2); prepare emails to T. Meerovich, et al., re same (.1); prepare email to B. Oppenheimer re release of signature re note (.1).
08/30/22	T. Moyron	0.40	316.00	B230	Call with E. Howe, M. Schwarzmman, A. Samples, et al. regarding status of upcoming hearings on BSI sale and Freddie agreement and other matters.
08/30/22	T. Moyron	0.10	79.00	B230	Call with T. Meerovich regarding debrief of call with Bravo and status of matters related to upcoming hearings.
08/30/22	T. Moyron	0.30	237.00	B230	Call with T. Ramm, D. Oien, S. Maizel, S. Samples and T. Meerovich regarding potential resolution of non-bifurcated liability issue raised by Freddie.
08/30/22	T. Moyron	0.90	711.00	B230	Multiple calls with S. Maizel regarding open issues related to upcoming hearings re BSI sale motion, Freddie 9019 motion, UST comment, and orders.
08/30/22	T. Moyron	0.70	553.00	B230	Analyze status of comments from GSEs and open issues re BSI order and 9019 order (.4); correspond with L. Harrison re BSI order (.3).
08/30/22	T. Moyron	0.50	395.00	B230	Correspond with M. Power re prepetition payments to Freddie and extension of deadline (.2); correspond with A. Samples, et al., re Committee inquiry and status of response (.3).
08/30/22	E. Smith	0.30	307.50	B230	Completed review of new cash flow DIP loan promissory note.
08/30/22	E. Smith	0.40	410.00	B230	Attended update call with representatives of FGMC, A. Samples, FTI, T. Meerovich, the cash flow DIP lender, M. Schwarzmman, and Dentons, T. Moyron.

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Date	Timekeeper	Hours	Amount	Task	Narrative
08/30/22	C. Montgomery	1.70	2,057.00	B230	Communications with S. Warren, J. Taylor and T. Moyron regarding Fannie Mae adequate assurances stipulation (1.2); communications with T. Moyron and C. O'Leary regarding UCC search question (.1); communications with T. Moyron and E. Howe regarding execution version of Freddie Term Sheet (.1); communications with T. Moyron, P. Moak regarding FNMA term sheet (.1); communications with M. Hyland regarding payment of Barclays fee statement (.1); communications with T. Meerovich regarding Barclays margin call question (.1).
08/31/22	C. Montgomery	2.10	2,541.00	B230	Communications with J. Murphy, E.L. Smith and T. Moyron regarding MSFTA annex updates and review of same (.4); communications with J. Taylor and T. Moyron regarding FNMA modifications to Motion to Approve Settlement, Motion to Approve Stipulation, Stipulation and Schedule 1 (1.3); Communications with T. Meerovich, S. Maizel, C. O'Leary regarding Flagstar Aging Fee issue (.4).
08/31/22	C. O'Leary	2.10	1,785.00	B230	Review/analyze comments to Rushmore Letter Agreement and exchange correspondence re: the same (0.7); exchange correspondence re: JVB Trust Termination Letters (0.2); exchange correspondence re: A&R Customers Loan Agreement and Ginnie Pledged Receivables (0.8); exchange correspondence re: limited waiver and MSFTA annexes (0.4).
08/31/22	T. Moyron	2.20	1,738.00	B230	Prepare for hearing on BSI sale motion and motions to approve Freddie 9019 motion and stipulation (1.2); conference call with L. Jones (.1), E. Howe (.1), and M. Power (.1) re hearing; analyze status of BSI sale order and comments (.3); prepare email to BSI re noticing of filing and order (.1); correspond with L. Harrison re BSI sale order (.3).
08/31/22	T. Moyron	0.80	632.00	B230	Participate in hearing on BSI sale motion, and motions to approve Freddie Mac settlement and stipulations.
08/31/22	T. Moyron	0.80	632.00	B230	Conference call with L. Smith regarding limited waiver from Barclays, SLS, and other matters (.4); conference call with T. Meerovich regarding budget, plan and timing (.4).

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Date	Timekeeper	Hours	Amount	Task	Narrative
08/31/22	T. Moyron	0.20	158.00	B230	Correspond with E. Howe re plan and other documents.
	Subtotal	350.20	324,965.00		

B260 - Board of Directors Matters

Date	Timekeeper	Hours	Amount	Task	Narrative
08/01/22	S. Schrag	0.10	65.00	B260	Call with M. Hyland of FTI regarding Board.
08/01/22	S. Schrag	0.60	390.00	B260	Participate in call with Board regarding pending matters.
08/01/22	T. Moyron	0.50	395.00	B260	Zoom conference with Board, FTI, et al., re issues related to upcoming hearing.
08/01/22	S. Maizel	0.50	485.00	B260	Zoom conference with Board, FTI, etc. re issues related to upcoming hearing.
08/01/22	E. Smith	0.20	205.00	B260	Attended meeting of FGMC Board of Directors.
08/02/22	E. Smith	0.80	820.00	B260	Attended meeting of FGMC board of directors.
08/02/22	S. Schrag	1.50	975.00	B260	Convert notes to Minutes (.8); participate in Board call and take notes (.7).
08/04/22	S. Schrag	0.80	520.00	B260	Participate in and take notes at Board Call (.7); revise notes to Minutes (.1).
08/04/22	E. Smith	1.10	1,127.50	B260	Attended meeting of FGMC board of directors (.9); confer with T. Moyron regarding board discussions (.2).
08/04/22	T. Moyron	0.70	553.00	B260	Participate in Board meeting, including updates on LOI, warehouse lenders, and related matters.
08/04/22	T. Moyron	0.20	158.00	B260	Call with L. Smith regarding pending matters, including Board call.
08/09/22	T. Moyron	0.40	316.00	B260	Participate in Board call regarding various updates, including GSEs, plan, etc.
08/09/22	S. Maizel	0.40	388.00	B260	Zoom conference with Board, FTI, etc. re pending issues.
08/09/22	E. Smith	0.60	615.00	B260	Attended meeting of FGMC board of directors.
08/09/22	S. Schrag	0.60	390.00	B260	Attend and take notes during Board call.

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Date	Timekeeper	Hours	Amount	Task	Narrative
08/11/22	S. Schrag	0.60	390.00	B260	Participate in and take notes during Board call (.4); confer with T. Moyron regarding the same (.2).
08/11/22	S. Maizel	0.40	388.00	B260	Zoom conference with Board re pending issues.
08/11/22	T. Moyron	0.80	632.00	B260	Participate in Board call regarding status and updates, including KEIP hearing and resolution, MSR sale, and other updates.
08/16/22	S. Maizel	0.70	679.00	B260	Zoom conference with Board re pending issues.
08/16/22	T. Moyron	0.70	553.00	B260	Board call with K. Vermer, D. Oien, T. Meerovich, S. Maizel, et al., regarding BSI sale, Freddie Mac status, and other pending matters.
08/16/22	S. Schrag	0.60	390.00	B260	Participate in and take notes of Board call.
08/19/22	S. Schrag	1.00	650.00	B260	Participate in and take notes during Board Call.
08/19/22	E. Smith	1.10	1,127.50	B260	Attended meeting of board of directors of FGMC.
08/19/22	S. Maizel	1.00	970.00	B260	Zoom conference with Board, etc. re reorganization transaction considerations, etc.
08/19/22	T. Moyron	1.00	790.00	B260	Participate in Board meeting re status and pending issues.
08/22/22	S. Schrag	0.50	325.00	B260	Participate in and take notes during Board call.
08/22/22	E. Smith	0.50	512.50	B260	Attended meeting of FGMC board of directors.
08/22/22	S. Maizel	0.50	485.00	B260	Zoom conference with Board re pending issues.
08/26/22	E. Smith	0.50	512.50	B260	Attended meeting of FGMC board of directors.
08/26/22	S. Maizel	0.60	582.00	B260	Zoom conference with Board, FTI, A. Samples, etc. re pending issues.
08/26/22	T. Moyron	0.50	395.00	B260	Participate in Board call with K. Verner, A. Samples, T. Meerovich, S. Maizel., et al., regarding pending matters, including plan, potential sale, agencies, and other matters.

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Date	Timekeeper	Hours	Amount	Task	Narrative
08/26/22	S. Schrag	0.60	390.00	B260	Participate in and take notes during Board call.
08/30/22	E. Smith	0.80	820.00	B260	Attended meeting of FGMC board of directors.
08/30/22	S. Maizel	0.70	679.00	B260	Zoom conference with Board, FTI, etc. re pending issues.
08/30/22	S. Schrag	0.80	520.00	B260	Participate in and take notes during Board call.
08/30/22	T. Moyron	0.80	632.00	B260	Participate in Board meeting regarding upcoming hearings on BSI sale and Freddie agreement and status related to other matters.
Subtotal		23.70	19,825.00		

B300 - Claims and Plan

Date	Timekeeper	Hours	Amount	Task	Narrative
08/03/22	D. Cook	0.70	434.00	B300	Video conference with Dentons and FTI regarding plan issues.
08/04/22	D. Cook	0.10	62.00	B300	Analysis of Dentons and PSZJ team email communications with respect to plan.
08/08/22	D. Cook	1.30	806.00	B300	Analyze draft plan (.6); email correspondence with L Macksoud regarding same (.1); email correspondence with M Caloway regarding same (.1); zoom conference with Dentons team and FTI team regarding same (.5).
08/10/22	D. Cook	0.40	248.00	B300	Analyze L Macksoud preliminary comments to plan draft.
08/11/22	D. Cook	0.10	62.00	B300	Analyze FTI email correspondence regarding plan draft.
08/16/22	D. Cook	0.60	372.00	B300	Video conference with Dentons/PSZJ/FTI regarding plan and disclosure statement preparation (.3); video conference with Dentons and PSZJ regarding same (.3).
08/17/22	D. Cook	0.90	558.00	B300	Video conference with Buckley/FTI/Dentons regarding cost of potential reorganization transaction under potential plan toggle.

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Date	Timekeeper	Hours	Amount	Task	Narrative
08/18/22	D. Cook	1.10	682.00	B300	Video conference with Buckley/FTI/Dentons regarding cost of potential reorganization transaction under potential plan toggle.
08/20/22	T. Moyron	0.50	395.00	B300	Analyze global notes and proposed changes (.2); correspond with G. Miller re same (.1); analyze excel Schedule E/F (.3).
08/21/22	E. Smith	0.30	307.50	B300	Confer with T. Moyron regarding plan description of loan settlement claims.
	Subtotal	6.00	3,926.50		

B310 - Claims Administration and Objections

Date	Timekeeper	Hours	Amount	Task	Narrative
07/26/22	G. Miller	1.90	1,463.00	B310	Revise motion to approve Freddie Mac settlement.
07/26/22	G. Miller	0.40	308.00	B310	Call with O. Alaniz and P. Moak re Freddie Mac term sheet.
08/01/22	G. Miller	0.30	231.00	B310	Emails with J.John, T.Moyron and J.McLemore re SourcePoint critical vendor treatment.
08/02/22	G. Miller	0.30	231.00	B310	Review motion for authorization to pay critical vendors and related documents in preparation for second day hearing.
08/03/22	T. Moyron	0.10	79.00	B310	Analyze email from M. Schmergel at DOJ re qui tam.
08/04/22	G. Miller	0.20	154.00	B310	Emails with J.John and T.Moyron re prepetition amounts owed to Deutsche Bank.
08/09/22	G. Miller	0.30	231.00	B310	Review stipulation with Liberty Mutual and email M.Calloway re same.
08/10/22	D. Cook	0.50	310.00	B310	Analyze draft bar date motion for needed information (.3); email correspondence with KCC regarding same (.2).

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Date	Timekeeper	Hours	Amount	Task	Narrative
08/10/22	S. Schrag	2.60	1,690.00	B310	Confer with J. John during reoccurring call regarding commissions, fsa accounts, and claims (.6); confer with S. Maizel regarding follow-up items related to commissions and claims (.4); conduct follow-up with Julie regarding the same (.2); review and analyze underlying agreements regarding change of incentives and TaxSaver (.3); confer with J. John, D. Oien, C. Reeves, C. Vacante, and S. Maizel regarding commissions, non-insider payments, upcoming payroll, and TaxSaver (.4); confer with S. Maizel regarding the same and best execution plan for scratch n dent loans (.1); conduct research related to change of incentives (.6).
08/12/22	D. Cook	0.30	186.00	B310	Email communication with KCC and PSZJ regarding bar date motion (.1); analysis of communications with FTI concerning same (.2).
08/12/22	G. Miller	0.10	77.00	B310	Call with S.Schrag re rejection of lease and sublease.
08/14/22	S. Maizel	0.50	485.00	B310	Research re dischargeability of FCA claims.
08/14/22	S. Maizel	0.50	485.00	B310	Review and respond to emails re section 525 arguments re GSE licenses.
08/17/22	G. Miller	0.20	154.00	B310	Emails with J.John and M.Calloway re whether sale of MRSSs affect surety bonds.
08/17/22	G. Miller	0.30	231.00	B310	Calls and emails with G.Siegel and J.Rosenthal re outstanding Deutsche Bank invoices.
08/18/22	G. Miller	1.30	1,001.00	B310	Emails with T.Moyron, T.Meerovich and S.Maizel re DB outstanding invoices (.8); Call with T.Meerovich and S.Maizel re same (.5).
08/19/22	G. Miller	0.40	308.00	B310	Review outstanding DB invoices.
08/22/22	G. Miller	0.40	308.00	B310	Call with T.Meerovich, S.Maizel, M.Jacobson, L.Macksoud, C.O'Leary re DB issue.
08/23/22	G. Miller	0.40	308.00	B310	Call with T.Moyron regarding DB and amounts owed and potential resolution (.3), and call with T.Moyron and T. Meerovich re same (.1).

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Date	Timekeeper	Hours	Amount	Task	Narrative
08/24/22	G. Miller	0.20	154.00	B310	Emails with C.O'Leary and J.John re DB issue.
08/25/22	G. Miller	0.80	616.00	B310	Review DB outstanding invoices and emails with C.O'Leary, T.Moyron and T.Meerovich re same.
08/26/22	G. Miller	1.30	1,001.00	B310	Emails with C.O'Leary and T.Meerovich re DB issue.
	Subtotal	13.30	10,011.00		

B320 - Plan and Disclosure Statement (incl. Business Plan)

Date	Timekeeper	Hours	Amount	Task	Narrative
08/03/22	T. Moyron	0.70	553.00	B320	Prepare email to N. Peterman re term sheet re Committee (.1); prepare email to M. Power re term sheet (.1); analyze matters related to DS and Plan (.4); and prepare email to L. Jones re same (.1).
08/03/22	S. Maizel	0.50	485.00	B320	Zoom call with FTI, etc. re plan formation issues.
08/03/22	T. Moyron	0.50	395.00	B320	Zoom call with FTI, et al., re plan formation issues.
08/04/22	T. Moyron	0.40	316.00	B320	Analyze matters related to plan documents and motion and timing (.3); correspond with L. Jones re same (.1).
08/08/22	T. Moyron	1.20	948.00	B320	Analyze plan and DS.
08/08/22	T. Moyron	1.00	790.00	B320	Call with T. Meerovich, M. Hyland, D. Cook, et al., re KEIP and plan matters.
08/08/22	S. Maizel	2.00	1,940.00	B320	Review and revise draft combined plan and disclosure statement.
08/10/22	T. Moyron	0.60	474.00	B320	Analyze DS and plan and comments thereto.
08/10/22	C. Montgomery	0.20	242.00	B320	Begin initial review of draft plan and disclosure statement.
08/11/22	C. Montgomery	5.00	6,050.00	B320	Continued review of draft plan and communications with L. Macksoud regarding same (3.5); phone conferences with L. Macksoud regarding same (1.5).

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08/11/22	T. Moyron	0.90	711.00	B320	Analyze matters related DS and plan and updated language (.8); prepare email to L. Jones re DS and plan (.1).
08/12/22	C. Montgomery	0.70	847.00	B320	Communications with L. Macksoud regarding draft plan and disclosure statement (.7).
08/12/22	L. Macksoud	1.40	1,078.00	B320	Review and further revise plan per additional comments from C. Montgomery.
08/12/22	T. Moyron	0.90	711.00	B320	Analyze and prepare DS and Plan (.3); conference call with M. Caloway regarding DS and Plan and various updates thereto (.5); prepare email to N. Peterman attaching DS and plan (.1).
08/14/22	S. Maizel	2.10	2,037.00	B320	Zoom conference with PSZJ and T. Moyron re plan timelines, structure, etc.
08/14/22	S. Maizel	1.70	1,649.00	B320	Zoom conference with C Montgomery, Lee Smith, etc. re responding to the DIP Cash Flow Lender questions re sale to BSI, settlement with Freddie Mac, etc. (1.3); t/c with T. Moyron re same (.4).
08/14/22	T. Moyron	2.90	2,291.00	B320	Analyze plan and prepare comments (.8); zoom meeting with L. Jones, S. Maizel, et al., regarding DS and Plan and related process, including timing, motions, and related matters (2.0); prepare email to N. Peterman re call to discuss DS and Plan (.1).
08/16/22	T. Moyron	2.50	1,975.00	B320	Conference call with L. Jones, S. Maizel, et al., re DS and plan (.4); Teams meeting with T. Meerovich, FTI team members, M. Caloway, L. Jones, et al. regarding DS and plan (1.3); zoom with N. Peterman, L. Jones, et al., regarding DS and Plan (.8).
08/16/22	T. Moyron	0.20	158.00	B320	Call with L. Jones re pending issues in cases, including plan matters.
08/16/22	S. Maizel	2.50	2,425.00	B320	Zoom conference with GT, PSZJ, etc re plan issues (.8); zoom conference with PSZJ, FTI, T. Moyron re plan and disclosure statement issues (1.3); zoom call with L. Jones re same (.4) .

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Date	Timekeeper	Hours	Amount	Task	Narrative
08/16/22	C. Montgomery	1.50	1,815.00	B320	Phone call with L. Macksoud regarding plan discussions (.1); teams call with T. Moyron, T. Meerovich, S. Maizel, L. Jones and M. Calloway and others regarding plan timing and contents (1.4).
08/17/22	C. Montgomery	0.30	363.00	B320	Review Greenberg comments on draft plan and disclosure statement.
08/17/22	T. Moyron	0.40	316.00	B320	Analyze issues related to plan and DS.
08/17/22	T. Moyron	0.10	79.00	B320	Analyze email from E. Howe re plan/DS.
08/17/22	S. Maizel	0.70	679.00	B320	Zoom call with Buckley, FTI, D. Oien, etc. regarding maintaining state license requirements, etc.
08/17/22	T. Moyron	0.90	711.00	B320	Conference call with T. Meerovich regarding plan, matters related to cash flow DIP lender, case status and strategy related thereto.
08/18/22	T. Moyron	1.20	948.00	B320	Teams Meeting with T. Meerovich, A. Samples, J. Bellman, et al., re transaction costs of reorganization transaction (.9); analyze deck regarding same (.3).
08/18/22	T. Moyron	0.20	158.00	B320	Call with L. Jones regarding matters related to DS and Plan.
08/18/22	T. Moyron	1.20	948.00	B320	Zoom meeting with L. Jones, S. Maizel., et al. re combined DS and plan (.8); analyze GT comments on same (.4).
08/18/22	S. Maizel	2.50	2,425.00	B320	Telephone conference with FTI, T. Moyron, etc. re analysis of dual track alternatives (1.4); review and respond to emails re same (.5); analyze issues related to potential FCA claims (.6).
08/18/22	C. Montgomery	8.10	9,801.00	B320	Review Greenberg plan changes and zoom call with L. Macksoud regarding discussion of specific draft if same changes (4.6); review Third Circuit precedent on classification (1.1); follow up call with L. Macksoud re Draft Plan language (1.5); Zoom call with L. Macksoud, L. Jones, T. Moyron, T. Cairns regarding plan and disclosure statement (.8); follow up call with L. Macksoud regarding version control of draft plan (.1).

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Date	Timekeeper	Hours	Amount	Task	Narrative
08/18/22	T. Moyron	0.60	474.00	B320	Analyze matters and materials related to reorganization transaction costs.
08/19/22	L. Macksoud	2.10	1,617.00	B320	Confer with G. Miller and C. O'Leary re Deutsche Bank fee request and review invoices and CMO in light of same (.5), call with Dentons and FTI working group to discuss sale issues and plan strategy (.8), review case law on classification of claims (.8).
08/19/22	T. Moyron	1.50	1,185.00	B320	Analyze materials related to reorganization transaction and provide comments thereto (1.3); correspond with L. Manning, et al., re same (.2).
08/19/22	T. Moyron	0.10	79.00	B320	Prepare email to N. Peterman re reorganization transaction costs.
08/20/22	T. Moyron	0.50	395.00	B320	Conference calls with S. Maizel (.2T, Cairns (.3), A. Samples (.1), regarding plan matters.
08/20/22	C. Montgomery	0.30	363.00	B320	Communications with T. Moyron and T. Meerovich regarding toggle plan costs (.1); communications with T. Moyron and L. Macksoud regarding abandonment of toggle plan (.1); communications with J. Krasne regarding possible M&A transaction (.1).
08/20/22	T. Moyron	0.70	553.00	B320	Conference call with M. Schwarzmman, N. Peterman, S. Maizel, et al., regarding costs analysis of reorganization transaction.
08/20/22	S. Maizel	1.40	1,358.00	B320	Zoom telephone conference with T. Moyron re combined plan and disclosure statement issues (.2); conference with M. Schwarzmman, N. Peterman, etc. re cost analysis and plan issues (.7); zoom conference with L. Jones, T. Moyron, etc. re same (.5).

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Date	Timekeeper	Hours	Amount	Task	Narrative
08/21/22	S. Maizel	3.90	3,783.00	B320	Zoom conference with T. Moyron and L. Jones re combined plan and disclosure statement issues (.5); zoom conference with C. Montgomery, L. Macsoud, etc. re same (.5); telephone conferences with T. Moyron re same (.8); telephone conference with D. Oien and T. Moyron re same (.4); analyze issues re classes in plan (.4); review and revise draft of combined plan and disclosure statement (1.3).
08/21/22	S. Maizel	0.60	582.00	B320	Zoom conference with M. Indelicato, Committee Counsel, re Former Employees and the Employee Obligations Motion (.2); email to FTI responding to inquiry re Employee Obligations Motion issues (.4).
08/21/22	T. Moyron	6.10	4,819.00	B320	Calls with S. Maizel regarding DS and plan (.8); zoom meeting with C. Montgomery and L. Macksoud re plan matters (.5); zoom meeting with L. Jones and S. Maizel regarding plan matters (.5); analyze updated draft DS and plan and redlines (2.8), prepare comments (.7), and analyze term sheet in connection therewith (.4); prepare email to D. Oien re plan matters (.1); conference call with L. Smith regarding plan and class re holdbacks (.3).
08/21/22	C. Montgomery	3.90	4,719.00	B320	Zoom call with S. Maizel and T. Moyron regarding draft plan without reorganization toggle and Customer Bank Guaranty Claim issues (1.0); phone calls with L. Macksoud regarding same (.5); follow up review of draft plan and communications with T. Moyron re same (2.4).
08/21/22	L. Macksoud	1.30	1,001.00	B320	Call with Dentons team to discuss draft plan and time line to file (.5), emails with T. Moyron and L. Jones re same (.3) call with C. Montgomery to discuss further changes (.2), edit and circulate revised plan and disclosure statement (.3).
08/22/22	L. Macksoud	0.80	616.00	B320	Review memo of PSZJ on issue of claim classification in the Third Circuit (.4), review Reorg Transaction Considerations (.4).
08/22/22	T. Moyron	0.20	158.00	B320	Call with T. Meerovich re plan matters.

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08/22/22	T. Moyron	1.80	1,422.00	B320	Analyze plan strategy and updated combined plan and DS matters (1.3); conference calls with N. Peterman regarding plan milestones and related matters (.2); correspond with N. Peterman re milestones (.1); analyze L. Jones, et al., emails re plan (.2).
08/22/22	S. Maizel	0.50	485.00	B320	Telephone conference with N. Peterman, T. Moyron re combined plan and disclosure statement issues.
08/22/22	C. Montgomery	0.40	484.00	B320	Communications with M. Calloway and T. Moyron regarding plan release issue (.1); phone call with T. Moyron regarding Greenberg plan issues (.3).
08/23/22	C. Montgomery	0.40	484.00	B320	Phone call with P. Partee regarding plan filing deadline(.1); phone calls with T. Moyron regarding same (.1); follow up communications with P. Partee regarding same (.2).
08/23/22	T. Moyron	0.70	553.00	B320	Zoom meeting with N. Peterman, E. Howe, and S. Maizel re plan and sale matters.
08/23/22	T. Moyron	0.20	158.00	B320	Call with T. Meerovich re plan matters.
08/23/22	S. Maizel	0.70	679.00	B320	Zoom conference with Greenberg Trauig attorneys re plan formulation issues.
08/24/22	S. Maizel	1.20	1,164.00	B320	Zoom conference with Greenberg Trauig re cash distributions, ability to sell state licenses, etc. (.7); revise memo re ability to sell state licenses under section 363 (.5).
08/24/22	S. Maizel	0.40	388.00	B320	Zoom conference with T. Moyron, etc. re Freddie Mac settlement.
08/24/22	T. Moyron	0.50	395.00	B320	Conference call with N. Peterman, E. Howe, D. Oien, and S. Maizel regarding sale and plan matters.
08/24/22	C. Montgomery	0.10	121.00	B320	Communications with P. Partee regarding plan filing milestone waiver.
08/25/22	T. Moyron	0.40	316.00	B320	Call with N. Peterman re timing of DS and Plan (.2); analyze matters related to timeline (.2).
08/26/22	T. Moyron	0.40	316.00	B320	Conference call with T. Cairns re plan deadline and sale motion (.3); prepare email to N. Peterman re plan matters (.1).

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Date	Timekeeper	Hours	Amount	Task	Narrative
08/26/22	T. Moyron	0.30	237.00	B320	Conference call with S. Maizel regarding pending matters, including plan and potential sale.
08/26/22	T. Moyron	0.40	316.00	B320	Zoom meeting with E. Howe, N. Peterman, and S. Maizel regarding plan and sale matters.
08/26/22	T. Moyron	0.10	79.00	B320	Call with T. Cairns re plan timeline.
08/26/22	T. Moyron	1.00	790.00	B320	Participate in Teams meeting with T. Meerovich, L. Manning, E. Moser, and S. Maizel re plan and sale process and related potential timeline.
08/26/22	T. Moyron	0.50	395.00	B320	Conference call with N. Peterman re plan and sale matters.
08/26/22	T. Moyron	1.10	869.00	B320	Zoom meeting with M. Schwarzmman, N. Peterman, T. Meerovich, A. Samples, et al., re timeline, plan and sale process, and surety issues.
08/26/22	S. Maizel	1.00	970.00	B320	Zoom conference with FTI, etc. re plan proposals.
08/26/22	S. Maizel	0.30	291.00	B320	Zoom conference with GT, etc. re plan proposals.
08/29/22	L. Macksoud	0.50	385.00	B320	Confer with FGMC regarding Multibank issues (.2), review various emails re open issues for sale motion and plan process (.3).
08/29/22	C. Montgomery	0.10	121.00	B320	Communications with T. Moyron regarding plan filing time line.
08/31/22	T. Moyron	0.40	316.00	B320	Analyze draft updated plan and redline.
	Subtotal	82.40	77,754.00		

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B400 - Bankruptcy-Related Advice

Date	Timekeeper	Hours	Amount	Task	Narrative
08/08/22	L. Macksoud	4.10	3,157.00	B400	Confer with client re finalized DACAs (.2), review and comment on draft stip from Fannie regarding frozen account issue (.5), emails with T. Moyron and client regarding same (.4), review Flagstar's motion for relief from stay, and proposed order and declaration in support of same (.7), confer with T. Moyron re same (.2) and emails with company re summary of business discussions and summary of legal issues (.4), confer with counsel to Flagstar re open issues, (.3) call with Dentons working group re agency issues (.8), call with counsel to JVB re 559 relief (.2) and confer with L. Smith re same (.1), coordinate with FTI on Rushmore serviced loans and emails with counsel to Rushmore re same (.3).
Subtotal		4.10	3,157.00		

B410 - General Bankruptcy Advice/Opinions

Date	Timekeeper	Hours	Amount	Task	Narrative
08/17/22	M. Maddry	1.50	525.00	B410	Conduct research regarding notice of termination of contract rights for Dee Kaur.
08/18/22	M. Maddry	0.30	105.00	B410	Conduct case law in 3rd Cir. Courts for recent discussion of separate classification of claims in bankruptcy cases.
Subtotal		1.80	630.00		

EMP - Employee matters

Date	Timekeeper	Hours	Amount	Task	Narrative
07/08/22	N. Hutson	0.30	148.50	EMP	Discuss WARN notice periods and liability issues with S. McCandless.

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Date	Timekeeper	Hours	Amount	Task	Narrative
07/18/22	N. Hutson	4.90	2,425.50	EMP	Telephone calls with S. McCandless regarding notices to governmental entities (0.9); prepare WARN notices to Mayor of Plano, TX and Texas Workforce Commission for August and September layoffs (2.9); emails with C. Vacante, S. McCandless, M. Kaptain, T. Moyron, and S. Alberts regarding the same and talking points for retained employees (1.1).
07/19/22	N. Hutson	0.30	148.50	EMP	Emails with S. Alberts, S. McCandless, and C. Vacante regarding discussion with retained employees (.1); Telephone call from S. McCandless regarding the same (.2).
08/01/22	S. McCandless	1.40	1,379.00	EMP	Review and consider KERP payment process and earlier communication from D. Oien (.70); review earlier WARN notices for same (.70).
08/01/22	T. Moyron	0.70	553.00	EMP	Attention to outstanding issues on wage motion and analyze order.
08/01/22	T. Moyron	0.60	474.00	EMP	Analyze issues related to KERP/KEIP and potential resolution.
08/01/22	S. Maizel	0.10	97.00	EMP	Telephone conference with T. Moyron re KERP/KEIP issues (.1); telephone conference with C. Doherty re same.
08/01/22	S. Maizel	0.50	485.00	EMP	Zoom conference with T. Meerovich, L. Jones, M. Litvak, etc. re KERP/KEIP issues.
08/01/22	T. Moyron	1.20	948.00	EMP	Multiple conference calls with C. Doherty re order on Employee Obligations Motion (.4); review and revise draft of final order on Employee Obligations Motion (.8).
08/01/22	T. Moyron	0.20	158.00	EMP	Telephone conference with S. Maizel re KERP/KEIP issues (.1); telephone conference with C. Doherty re same (.1).
08/01/22	T. Moyron	0.50	395.00	EMP	Zoom conference with T. Meerovich, L. Jones, M. Litvak, et al., re KERP/KEIP issues.
08/01/22	S. Maizel	1.20	1,164.00	EMP	Multiple conference calls with C. Doherty re order on Employee Obligations Motion (.4); review and revise draft of final order on Employee Obligations Motion (.8).

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Date	Timekeeper	Hours	Amount	Task	Narrative
08/01/22	S. Maizel	0.60	582.00	EMP	Analyze issues related to potential settlement with UCC on Employees Obligation Motion.
08/01/22	S. Maizel	0.90	873.00	EMP	Analyze issues related to KERP/KEIP motion and potential settlements to UCC issues thereto.
08/02/22	S. McCandless	0.40	394.00	EMP	Review and analyze communication from D. Oien regarding 8-15 departure letter, KERP payments, and waiver of claims.
08/02/22	S. Maizel	0.50	485.00	EMP	Telephone conference with A. Samples and T. Moyron re KERP/KEIP issues (.2); review and respond to emails re settlement on KERP/KEIP with UCC (.3).
08/02/22	S. Maizel	0.60	582.00	EMP	Review and respond to emails re order on Employee Obligations Motion.
08/03/22	S. McCandless	1.40	1,379.00	EMP	Communicate with Dentons team regarding next steps for KERP recipients being laid off (.20); communicate with D. Oien and C. Vacante regarding waiver of claims for initial KERP recipients and WARN requirements for delayed layoffs (.50); related brief research (.30); review response from C. Vacante (.20); review information related to M. Querrey received from T. Moyron (.20).
08/03/22	T. Moyron	0.10	79.00	EMP	Analyze email from T. Meerovich re IB.
08/03/22	S. Maizel	0.60	582.00	EMP	Review and respond to emails re order on Employee Obligations Motion.
08/04/22	S. McCandless	0.30	295.50	EMP	Communicate with D. Oien regarding release agreement and communication plan for employees to be laid off.
08/04/22	S. McCandless	2.00	1,970.00	EMP	Review communications regarding M. Querrey overpayment issues (.30); communicate with Dentons team regarding same (.20); telephone call with S. Maizel regarding same (.20); review and analyze plan and overpayment options received from S. Maizel (.30); research Texas law for allowability of deduction from wage payments (.80); report to S. Maizel and T. Moyron regarding same (.20).

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Date	Timekeeper	Hours	Amount	Task	Narrative
08/04/22	S. McCandless	0.80	788.00	EMP	Initial review of FGMC form of release agreement for revision for use for employees to be laid off.
08/04/22	T. Moyron	0.60	474.00	EMP	Analyze LOI.
08/04/22	T. Moyron	0.40	316.00	EMP	Conference call with A. Samples, T. Meerovich, et al., re KEIP and status.
08/04/22	S. Maizel	1.40	1,358.00	EMP	Telephone conference with T. Moyron re issues re payment to individual employee (.1); zoom conference with A. Samples, etc. re same (.3); review and respond to emails re same (.8); telephone conference with S. McCandless re same (.2).
08/05/22	S. Maizel	0.30	291.00	EMP	Review and respond to emails re resolution of employee payment issues.
08/05/22	T. Moyron	0.20	158.00	EMP	Analyze correspondence from S. McCandless, et al., re employment matters.
08/05/22	T. Moyron	0.30	237.00	EMP	Analyze emails from D. Galfus, et al. re KEIP re proposal (.2) and prepare emails to T. Meerovich, et al., re same (.1).
08/08/22	T. Moyron	0.30	237.00	EMP	Conference call with D. Oien, S. McCandless, et al., re RIF.
08/08/22	T. Moyron	1.00	790.00	EMP	Zoom meeting with T. Meerovich, L. Jones, et al., re Committee's proposal and KEIP matters.
08/08/22	T. Moyron	1.30	1,027.00	EMP	Zoom meeting with A. Samples, D. Oien, et al., re KEIP (.7) and follow up regarding same (.6).
08/08/22	T. Moyron	0.30	237.00	EMP	Prepare emails to L. Jones, A. Samples, et al., re KEIP.
08/08/22	T. Moyron	0.10	79.00	EMP	Prepare email to D. Galfus at BRG, et al., re KEIP proposal.
08/08/22	S. Maizel	0.60	582.00	EMP	Zoom call with FTI, etc. re RIF issues.
08/08/22	S. Maizel	0.80	776.00	EMP	Review and respond to emails from FTI re treatment of commissions as prepetition claims.
08/08/22	S. Maizel	2.30	2,231.00	EMP	Zoom call re KEIP issues with PSZJ, FTI, A. Samples, etc. (1.0); telephone conference with A. Samples, etc. re KEIP issues (.7); telephone conference with T. Moyron, T. Meerovich, etc. re KEIP issues (.6).

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08/08/22	S. Maizel	1.00	970.00	EMP	Zoom call with A. Samples, etc. re KEIP issues.
08/08/22	S. McCandless	2.10	2,068.50	EMP	Prepare notes for client call to discuss 8-15 RIF Plan and KERP mechanics (.40); review client agenda to prepare for same (.20); review and analyze KERP details to prepare for same (.90); attend conference call with D. Oien, C. Vacante and FTI (.60).
08/08/22	S. McCandless	1.90	1,871.50	EMP	Research for WARN procedures applicable to employees with delayed layoff dates (.50); prepare WARN notice for employees with layoff date delayed beyond 8-15 (.80); communicate with C. Vacante regarding same (.20); provide information and instructions to J. Peterson for drafting of anticipated updated governmental WARN notices (.40).
08/09/22	S. McCandless	2.60	2,561.00	EMP	Initial preparatory work on release agreements for employees being laid off on 8-15 (.90); review workforce list provided by C. Vacante for same (.70); telephone call with C. Vacante regarding data for Older Workers Benefit Protection Act attachment to over 40 releases and other release matters(.40); related review of data and provide instructions to J. Peterson for use of same (.60).
08/09/22	S. McCandless	2.90	2,856.50	EMP	Review first draft of departure letter incorporating KERP and release language received from A. Villasenor of FTI (.30); communicate with A. Villasenor regarding same (.10); review letter sent to employees on 6-24 for same (.20); review C. Vacante's updates to same (.10); communicate with R. Chesley and C. Vacante regarding questions on same (.40); revise same (.80); review revised letter received from A. Villasenor incorporating changes (.20); further communicate with A. Villasenor regarding same (.10); review further updates from C. Vacante (.10); communicate with clients and FTI regarding timing of sending of letter and release and procedures for same (.60).

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Date	Timekeeper	Hours	Amount	Task	Narrative
08/09/22	J. Peterson	1.50	787.50	EMP	Analyze and evaluate existing WARN notices and related materials in order to begin drafting the release agreements for employees scheduled to be laid off on August 15, 2022.
08/09/22	J. Peterson	0.60	315.00	EMP	Discussion with S. McCandless regarding the WARN notices and related documents.
08/09/22	J. Peterson	2.10	1,102.50	EMP	Draft the general release agreement for employees over 40 years old.
08/09/22	T. Moyron	0.50	395.00	EMP	Mutiple calls with S. Maizel regarding KEIP issues.
08/09/22	T. Moyron	1.30	1,027.00	EMP	Teams meeting with Committee advisors, T. Meerovich, M. Litvak, et al. re KEIP (.5) and follow up call regarding same (.7); call with BRG advisor M. Renzi thereafter (.1).
08/09/22	S. Maizel	1.70	1,649.00	EMP	Zoom conference with UCC advisors, FTI, etc. re KEIP issues (.5); follow-up call with UCC, FTI, etc. re KEIP issues (.7); multiple calls with T. Moyron re KEIP issues (.5).
08/09/22	S. Maizel	0.90	873.00	EMP	Zoom conference with L. Jones, M. Litvak, T. Meerovich, T. Moyron, etc. re KEIP issues.
08/09/22	T. Moyron	0.20	158.00	EMP	Analyze wage motion and interim order with respect to certain authorized payments.
08/09/22	T. Moyron	0.10	79.00	EMP	Analyze emails from A. Samples re labor.
08/09/22	T. Moyron	0.20	158.00	EMP	Analyze emails from M. Hyland re employee payments (.1); analyze email from J. John re Flexible Spending Account Challenges (.1).
08/10/22	S. Maizel	0.80	776.00	EMP	Zoom conference with D. Oien, C. Vacante, etc. re treatment of commissions, etc. (.7); telephone conference with S. Schrag re same (.1).
08/10/22	S. Maizel	1.60	1,552.00	EMP	Zoom conference with A. Samples, T. Meerovich, etc. re KEIP issues (1.0); telephone conference with UCC counsel, T. Meerovich, etc. re same (.6).
08/10/22	S. Maizel	0.80	776.00	EMP	Review and respond to emails re payments to employee issues.
08/10/22	S. Maizel	0.20	194.00	EMP	Review and respond to emails re impact of Employee Obligation Motion on Current Employees.

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Date	Timekeeper	Hours	Amount	Task	Narrative
08/10/22	S. Maizel	0.60	582.00	EMP	Zoom conference with A. Samples, D. Oien, T. Meerovich, etc. re RIF and KERP issues.
08/10/22	T. Moyron	2.70	2,133.00	EMP	Conference call with M. Power, M. Indelicato, S. Maizel and T. Meerovich re KEIP (.6); conference call with A. Samples, T. Meerovich, L. Jones, et al., re Committee proposal (1.0); call with L. Jones re Committee proposal (.1); call with M. Litvak, L. Jones, T. Meerovich re KEIP, preparation for contested hearing and related matters (.7); analyze Committee proposal and related emails from M. Power and M. Indelicato (.3).
08/10/22	T. Moyron	0.20	158.00	EMP	Correspond with M. Hyland re KEIP participants.
08/10/22	T. Moyron	0.20	158.00	EMP	Analyze email from A. Villsenor re letter to employees (.1); analyze proposed letter to be sent to employees (.1).
08/10/22	T. Moyron	0.20	158.00	EMP	Analyze email from A. Samples re employee matter (.1); analyze proposed email and provide comment thereto re employee communication (.1).
08/10/22	T. Moyron	0.20	158.00	EMP	Correspond with M. Litvak, et al., re Committee re KEIP.
08/10/22	T. Moyron	0.50	395.00	EMP	Correspond with M. Power re KEIP (.1) and analyze proposed terms by Committee re KEIP (.2); prepare emails to A. Samples, L. Jones, et al., re same (.2).
08/10/22	J. Peterson	1.30	682.50	EMP	Analyze and evaluate the contents required to be in an updated WARN notice to the state and state workforce commission to inform them of a change to an upcoming layoff.
08/10/22	J. Peterson	1.20	630.00	EMP	Draft updated WARN notices to Mayor Muns and the Texas workforce commission informing them of a change to the upcoming August 15, 2022 layoff.
08/10/22	J. Peterson	0.70	367.50	EMP	Discussions with S. McCandless regarding the updated WARN notices to Mayor Muns and the Texas Workforce Commission.

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Date	Timekeeper	Hours	Amount	Task	Narrative
08/10/22	J. Peterson	0.60	315.00	EMP	Call with the client to discuss the release agreements for the employees being laid off on August 15, 2022.
08/10/22	J. Peterson	0.60	315.00	EMP	Discussions with S. McCandless regarding the release agreements for employees under 40 years of age.
08/10/22	S. McCandless	2.70	2,659.50	EMP	Call with D. Oien, C. Vacante, FTI, and S. Maizel to discuss and finalize over 40 release agreement (.60); revise over 40 release following conference call (.60); forward revised over 40 release to D. Oien and C. Vacante with related instructions (.20); review and revise under 40 and California releases (.80); discuss same with J. Peterson (.30); forward same to C. Vacante with comments on same (.20).
08/10/22	S. McCandless	3.80	3,743.00	EMP	Review, revise, and supplement first draft of over 40 release agreement (2.80); related review of employee demographics (.40); forward to clients and FTI with comments regarding same (.30); review C. Doherty's response to same (.30).
08/10/22	S. McCandless	0.40	394.00	EMP	Communicate with D. Oien and C. Vacante regarding WARN update notice for employees with 8-15 layoff date whose layoffs will be delayed; provide same (.40).
08/10/22	S. McCandless	1.00	985.00	EMP	Communicate with T. Moyron and S. Maizel regarding status, strategy, and handling as to M. Querrey overpayment (.20); prepare proposed email to Querrey at request of T. Moyron (.60); communicate with T. Moyron and S. Maizel regarding same (.20).
08/10/22	S. McCandless	0.80	788.00	EMP	Review D. Oien's proposed edits to letter to employees being laid off on 8-15 (.30); respond with proposed revisions to same (.30); further related communications with D. Oien and FTI (.20).
08/10/22	S. McCandless	0.50	492.50	EMP	Communicate with C. Vacante regarding WARN notices for employees with updated layoff dates (.30); instructions to J. Peterson for drafting of related state and local government notices (.20).

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Date	Timekeeper	Hours	Amount	Task	Narrative
08/10/22	T. Moyron	0.70	553.00	EMP	Zoom conference with D. Oien, C. Vacante, et al., re treatment of commissions, etc.
08/10/22	T. Moyron	1.60	1,264.00	EMP	Zoom conference with A. Samples, T. Meerovich, et al., re KEIP issues (1.0); telephone conference with UCC counsel, T. Meerovich, et al., re same (.6).
08/10/22	T. Moyron	0.60	474.00	EMP	Zoom conference with A. Samples, D. Oien, T. Meerovich, et al., re RIF and KERP issues.
08/11/22	S. Maizel	0.50	485.00	EMP	Review and respond to emails re employment issues.
08/11/22	S. Maizel	3.90	3,783.00	EMP	Zoom conference with UCC, FTI, etc. re KEIP Issues (.5); telephone conference with T. Moyron re KEIP issues (.1); telephone conference with S. Alberts re same (.1); telephone conference with T. Meerovich, etc. re KEIP issues. (.5); participate in hearing on KEIP issues including calls with UCC, etc. to resolve issues (2.2); review and respond to emails re KEIP issues and settlement (.5.).
08/11/22	S. McCandless	1.60	1,576.00	EMP	Review and revise J. Peterson's drafts of governmental WARN notices for 8-15 layoff dates which have changed (.70); communicate with C. Vacante regarding same and also regarding latest developments impacting same (.40); further revise and forward same to C. Vacante with comments on same (.50).
08/11/22	S. McCandless	0.30	295.50	EMP	Communicate with Dentons team and clients regarding overpayment matters.
08/11/22	T. Moyron	0.30	237.00	EMP	Correspondence with G. Miller, et al., and analyze related emails re OCP.
08/11/22	T. Moyron	2.30	1,817.00	EMP	Analyze exhibits, order, revised KEIP plan and related matters re KEIP (1.4); correspond with A. Samples, M. Power, PSZJ, et al., re same (.9).
08/11/22	T. Moyron	2.20	1,738.00	EMP	Attend hearing on KEIP (.4); during recess attend to conference calls with M. Powers and M. Indelicato (.2); A. Samples, et al., (.5); zoom meeting with cash flow DIP lender (.2); and prepare revised KEIP plan and redlines (.9).

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Date	Timekeeper	Hours	Amount	Task	Narrative
08/12/22	S. McCandless	0.80	788.00	EMP	Communicate with clients regarding letter to employees being laid off on 8-15 (.20); communicate with D. Oien and C. Vacante regarding KERP payment questions and analyze same (.60).
08/12/22	S. Maizel	0.40	388.00	EMP	Zoom conference with D. Oien, S. Schrag, etc. re pending issues, including employee payments, etc. (.2); review and respond to emails re employee payments related to upcoming RIF and Employee Obligations Order (.2).
08/16/22	S. McCandless	2.70	2,659.50	EMP	Review communication from D. Oien regarding KERP and KEIP payments and related release matters (.30); communicate with Dentons team regarding same (.20); related review of court order (.80); further communicate with S. Alberts regarding same (.10); respond to D. Oien (.20); further consider same and communicate with Dentons team (.20); draft and provide information to D. Oien on KERP and KEIP payment terms and provide comments on same (.60); review S. Alberts' further comments on same (.30).
08/17/22	S. McCandless	0.40	394.00	EMP	Communicate with S. Alberts regarding earlier forms of releases and provide same for further work to be done.
08/17/22	T. Moyron	0.40	316.00	EMP	Analyze M. Hyland, et al., emails regarding payments to employees (.2); Zoom meeting with C. Doherty, et al., re payments to employees (.2).
08/17/22	T. Moyron	0.60	474.00	EMP	Analyze emails from T. Meerovich and A. Samples re Pipeline (.2); analyze KEIP plan language (.1); correspond with S. Alberts re same (.2); prepare emails to T. Meerovich and A. Samples re Pipeline and KEIP (.1).
08/17/22	S. Maizel	0.40	388.00	EMP	Zoom call payments to employees under the interim wages motion order.
08/17/22	S. Maizel	1.00	970.00	EMP	Review and respond to emails re various issues under KERP, KIEP, etc.
08/18/22	S. Maizel	0.90	873.00	EMP	Zoom conference with FTI, etc. re KERP issues (.3); review and respond to emails re same (.6).

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Date	Timekeeper	Hours	Amount	Task	Narrative
08/18/22	S. Maizel	1.00	970.00	EMP	Analyze issues related to potential WARN Act claims.
08/18/22	S. McCandless	0.30	295.50	EMP	Communicate with S. Alberts, Dentons team, and D. Oien regarding KEIP release.
08/18/22	T. Moyron	0.30	237.00	EMP	Analyze email from M. Hyland, D. Oien, et al. re KEIP and KERP.
08/19/22	T. Moyron	0.60	474.00	EMP	Analyze emails from S. McCandless, et al., regarding release (.3); analyze proposed release and provide comments (.2) and prepare email regarding same (.1).
08/19/22	S. Maizel	0.50	485.00	EMP	Zoom conference re WARN Act issues.
08/19/22	S. McCandless	5.20	5,122.00	EMP	Review and analyze S. Alberts' modification of earlier KERP release for KEIP recipients (.60); review C. Doherty's comments on same (.20); communicate with S. Alberts regarding same (.20); conference call with D. Oien and C. Vacante to discuss same (.50); revise same (1.00); forward to S. Alberts and C. Doherty with detailed comments on same (.50); review and respond to S. Alberts' questions regarding same (.70); discuss further review and revisions to same with J. Peterson (.20); review revised version (.20); forward same to T. Moyron and S. Maizel with further comments (.30); communicate with T. Moyron and S. Alberts regarding further changes (.20); instructions to J. Peterson regarding further FGMC documentation needed (.40); communicate with C. Vacante regarding 9-15 RIF list (.20).
08/19/22	J. Peterson	1.00	525.00	EMP	Discussion with S. Alberts, S. Maizel, S. McCandless, and the client regarding the KEIP and KERP agreements.
08/22/22	T. Moyron	1.10	869.00	EMP	Analyze T. Meerovich, et al., emails regarding employee payments and related matters (.3); attention to hearing and resolution or continuance, including correspondence with T. Cairns and S. Maizel (.4); analyze release and prior redline (.2) and correspond with S. McCandless re same (.2).

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08/22/22	T. Moyron	0.40	316.00	EMP	Analyze consultant agreement (.2); correspond with T. Meerovich, et al., re same (.2).
08/22/22	S. Maizel	0.80	776.00	EMP	Review and respond to emails re payments to Former Employees under Employee Wage Order (.3); review and respond to emails re hearing on Employee Wage Motion (.5).
08/22/22	S. Maizel	0.50	485.00	EMP	Telephone conference with FTI, etc. re employee obligations issues.
08/22/22	S. McCandless	2.20	2,167.00	EMP	Communicate with T. Moyron regarding KEIP release (.20); communicate with S. Alberts regarding his questions regarding release language and respond to same (.40); respond to T. Meerovich of FTI regarding her questions (.20); review revised KEIP release (.30); communicate with D. Oien and C. Vacante regarding KERP and KEIP payments (.40); communicate with J. Peterson regarding California form of release (.10); review same (.30); instructions to J. Peterson regarding KERP release with multiple payments (.30).
08/22/22	J. Peterson	1.00	525.00	EMP	Revise the over 40 and California over 40 August 15 layoff releases in order to apply it to additional releases needed for the upcoming KERP payments.
08/23/22	T. Moyron	0.20	158.00	EMP	Correspond with A. Samples, et al., re employment agreement.
08/23/22	S. McCandless	0.70	689.50	EMP	Review and analyze email from L. Harrison forwarded by T. Moyron regarding Judge Goldblatt's treatment of remote employees for purposes of WARN Act (.30); review S. Alberts related comments (.20); consider and respond to same (.20).
08/24/22	S. McCandless	0.40	394.00	EMP	Communicate with C. Vacante regarding first release for employees to receive two KERP payments (.20); communicate with S. Alberts regarding same (.20).
08/24/22	S. Maizel	0.50	485.00	EMP	Telephone conference with T. Meerovich, etc. re KERP issues.
08/25/22	T. Moyron	0.10	79.00	EMP	Call with T. Meerovich regarding KERP issues.

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08/25/22	S. McCandless	0.60	591.00	EMP	Communicate with C. Vacante regarding KERP release for employees to receive two payments (.30); instructions to J. Peterson regarding drafting of same (.30).
08/26/22	S. McCandless	3.80	3,743.00	EMP	Discuss preparation of KERP release for first of two payments with J. Peterson (.20); review earlier interim payment KEIP release, earlier KERP release, and Motion for Order approving KERP for bankruptcy-related language to be included in KERP release being drafted (.90); provide initial related instructions to J. Peterson for drafting of same (.20); draft and revise KERP related language for inclusion and provide same to J. Peterson (.90); communicate with S. Alberts regarding same (.30); review J. Peterson's first draft and provide comments for revisions to same (.60); further discuss KERP release for first of two payments with J. Peterson and revise and finalize same (.70).
08/26/22	T. Moyron	0.20	158.00	EMP	Analyze T. Meerovich, et al., emails regarding KEIP.
08/26/22	S. Maizel	0.40	388.00	EMP	Review and respond to emails re KEIP payments re pipeline.
08/26/22	J. Peterson	1.00	525.00	EMP	Discussions with S. McCandless regarding the clauses to be included in the KERP release.
08/26/22	J. Peterson	2.20	1,155.00	EMP	Revise the KERP release to ensure all necessary clauses and language are included in order to capture the nature of KERP payments.
08/27/22	S. McCandless	0.10	98.50	EMP	Communicate with S. Alberts regarding review of pending KERP release.
08/29/22	S. Maizel	0.70	679.00	EMP	Review and respond to emails re KERP payments to employees.
08/29/22	S. Maizel	0.40	388.00	EMP	Review and respond to emails re payments to Former Employees under Employee Obligations Motion.

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Date	Timekeeper	Hours	Amount	Task	Narrative
08/29/22	S. McCandless	4.10	4,038.50	EMP	Review and analyze C. Doherty's comments to release agreement for first of two KERP payments (.50); communicate with S. Alberts regarding same (.10); communicate with C. Vacante regarding same and related planning matters (.30); further communicate with C. Vacante regarding information needed on current employees (.30); review and analyze current employee impact list forwarded by C. Vacante for further employment work to be done (.70); telephone call with J. Peterson regarding status with C. Vacante as to various pending matters and in preparation for telephone call with C. Vacante and to discuss upcoming employment work to be done (.70); review S. Albert's suggested changes to over 40 release for employees obtaining multiple KERP payments and review same with J. Peterson (.80); review J. Peterson's responding information for revisions to said release in light of language of earlier releases and applicable law (.70).
08/29/22	S. McCandless	0.20	197.00	EMP	Telephone conference with Geoff Miller re redaction of certain information on employees from documentation to be filed publicly due to privacy concerns.
08/29/22	J. Peterson	1.00	525.00	EMP	Discussion with S. McCandless regarding the KERP Release Agreements.
08/29/22	J. Peterson	0.70	367.50	EMP	Continue revising the KERP Release Agreement in order to ensure all of the necessary terms are properly stated and compliant with federal law.
08/30/22	J. Peterson	0.50	262.50	EMP	Discussion with Cassie regarding the status of the KERP release agreements.
08/30/22	J. Peterson	2.50	1,312.50	EMP	Discussions with S. McCandless regarding the KERP Release Agreements (.7); revise the over 40 KERP Release Agreement to ensure all necessary provisions are included (.8); draft the under 40 KERP Release Agreement (1.0).

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Date	Timekeeper	Hours	Amount	Task	Narrative
08/30/22	S. McCandless	4.80	4,728.00	EMP	Review and analyze S. Albert's proposed changes to KERP release for first of multiple payments in context of employment law (.60); research C. Doherty's proposed addition as related to Texas law (.30); revise release and forward same to S. Alberts (.70); communicate with S. Alberts regarding same (.20); telephone call with S. Albert's to agree upon changes (.50); revise release for consistency with same and related further consideration of language (.90); conference call with C. Vacante to discuss status and future handling of pending HR matters and related preparation for same (in anticipation of C. Vacante's departure (.80); instructions to J. Peterson for finalizing release and creating under 40 release (.40); forward first draft of over 40 release to clients with comments on same (.20); review revised current employee list from C. Vacante following conference call (.20).
08/31/22	S. McCandless	0.90	886.50	EMP	Review first draft of under 40 release (.30); instructions to J. Peterson for revisions to same (.20); final revisions to under 40 release for first of multiple KERP payments (.30); forward over and under 40 first KERP releases to C. Vacante, D. Oien, and Dentons team (.10).
08/31/22	T. Moyron	0.40	316.00	EMP	Call with D. Oien and S. Maizel regarding employee matters and analyze related issues.
08/31/22	J. Peterson	1.00	525.00	EMP	Finalize the under 40 and over 40 KERP Release Agreements.
	Subtotal	135.10	115,870.50		

INS - Insurance

Date	Timekeeper	Hours	Amount	Task	Narrative
08/24/22	T. Moyron	0.10	79.00	INS	Analyze email from D. Oien re surety bond analysis.

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Date	Timekeeper	Hours	Amount	Task	Narrative
08/25/22	T. Moyron	0.60	474.00	INS	Review analysis regarding surety bonds (.3); correspond with L. Manning re same (.1); prepare email to N. Peterman re surety bonds (.2).
	Subtotal	0.70	553.00		

WARNACT- WARN Act Issues

Date	Timekeeper	Hours	Amount	Task	Narrative
08/18/22	T. Moyron	0.20	158.00	WARNA	Analyze matters related to releases.
	Subtotal	0.20	158.00		

TIME AND FEE SUMMARY

<u>Timekeeper</u>	<u>Rate</u>	<u>Hours</u>	<u>Fees</u>
C. Montgomery	\$1,210.00	133.10	\$161,051.00
R. Heidenreich	\$930.00	0.80	\$744.00
S. Alberts	\$990.00	16.40	\$16,236.00
S. Franco	\$1,340.00	5.50	\$7,370.00
S. Maizel	\$970.00	150.90	\$146,373.00
T. Moyron	\$790.00	256.10	\$202,319.00
C. O'Leary	\$850.00	102.70	\$87,295.00
E. Smith	\$1,025.00	78.80	\$80,770.00
G. Miller	\$770.00	93.90	\$72,303.00
J. Murphy	\$1,045.00	17.30	\$18,078.50
L. Harrison	\$1,140.00	129.60	\$147,744.00
L. Macksoud	\$770.00	74.40	\$57,288.00
R. Richards	\$940.00	0.10	\$94.00
S. McCandless	\$985.00	54.80	\$53,978.00

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<u>Timekeeper</u>	<u>Rate</u>	<u>Hours</u>	<u>Fees</u>
C. Doherty, Jr.	\$695.00	17.50	\$12,162.50
H. Overcash	\$740.00	5.00	\$3,700.00
N. Hutson	\$495.00	5.50	\$2,722.50
D. Cook	\$620.00	37.90	\$23,498.00
J. Nelson	\$680.00	0.90	\$612.00
S. Schrag	\$650.00	59.50	\$38,675.00
D. Kaur	\$570.00	11.50	\$6,555.00
J. Peterson	\$525.00	19.50	\$10,237.50
B. Fullerton	\$350.00	0.30	\$105.00
M. Maddry	\$350.00	1.80	\$630.00
C. Theodore	\$320.00	0.90	\$288.00
G. Medina	\$360.00	7.80	\$2,808.00
J. Milko	\$320.00	0.30	\$96.00
K.M. Howard	\$340.00	<u>5.80</u>	<u>\$1,972.00</u>
Totals		1,288.60	\$1,155,705.00

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SUMMARY OF AMOUNT DUE BY TASK CODE

Task Code	Task Code Name	Fees
B100	Administration	4,496.00
B110	Case Administration	118,550.50
B120	Asset Analysis and Recovery	48,067.00
B130	Asset Disposition	299,262.50
B140	Relief from Stay/Adequate Protection Proceedings	11,732.00
B150	Meetings of and Communications with Creditors	9,973.00
B160	Fee/Employment Applications	2,888.00
B170	Fee/Employment Objections	3,058.00
B180	Avoidance Action Analysis	847.00
B185	Assumption/Rejection of Leases and Contracts	28,599.50
B190	Other Contested Matters (excl. assumption/rejection motions)	36,645.50
B210	Business Operations	9,574.50
B220	Employee Benefits/Pension	25,161.50
B230	Financing/Cash Collections	324,965.00
B260	Board of Directors Matters	19,825.00
B300	Claims and Plan	3,926.50
B310	Claims Administration and Objections	10,011.00
B320	Plan and Disclosure Statement (incl. Business Plan)	77,754.00
B400	Bankruptcy-Related Advice	3,157.00
B410	General Bankruptcy Advice/Opinions	630.00
EMP	Employee matters	115,870.50
INS	Insurance	553.00
WARNA CT	WARN Act Issues	158.00
	Total This Matter	\$1,155,705.00

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DISBURSEMENT DETAIL

<u>Date</u>	<u>Description</u>	<u>Amount</u>
7/6/2022	Corporate Fees Certificates of Good Standing and Articles of Incorporation for J. Nelson.	1,010.77
	SUBTOTAL	1,010.77
8/26/2022	Delivery & Postage ACE ATTORNEY 476322 DEL PRIORITY TO SAM MAIZEL 2	60.78
8/26/2022	Delivery & Postage ACE ATTORNEY 476322 DEL PRIORITY TO TANIA MOYRON	26.68
	SUBTOTAL	87.46
8/10/2022	Lexis SCHRAG\ SARAH	49.50
8/10/2022	Lexis SCHRAG\ SARAH	95.00
	SUBTOTAL	144.50
8/25/2022	Outside Professional Services Dentons Bingham Greenebaum invoice 4527679 for professional services rendered through July 31, 2022.	21,932.00
	SUBTOTAL	21,932.00
8/1/2022	WESTLAW COOK\ DAVID F	150.00
8/30/2022	WESTLAW SCHRAG\ SARAH	32.50
8/30/2022	WESTLAW MEDINA\ GEORGE	134.88
8/9/2022	WESTLAW KAUR\ DEE	513.70
8/9/2022	WESTLAW OVERCASH\ HUDSON	1,283.29
8/10/2022	WESTLAW KAUR\ DEE	28.31
8/10/2022	WESTLAW MEDINA\ GEORGE	375.00
8/10/2022	WESTLAW OVERCASH\ HUDSON	600.00
8/14/2022	WESTLAW OVERCASH\ HUDSON	375.00
8/15/2022	WESTLAW KAUR\ DEE	75.00
8/17/2022	WESTLAW MADDRY\ MICA	375.00
8/17/2022	WESTLAW KAUR\ DEE	75.00
8/18/2022	WESTLAW MADDRY\ MICA	225.00
8/18/2022	WESTLAW KAUR\ DEE	225.00
8/19/2022	WESTLAW KAUR\ DEE	375.00
8/22/2022	WESTLAW KAUR\ DEE	150.00

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<u>Date</u>	<u>Description</u>	<u>Amount</u>
8/23/2022	WESTLAW KAUR\DEE	75.00
		SUBTOTAL
		5,067.68
	Total Disbursements	\$28,242.41
	Total This Matter	\$1,183,947.41

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COMBINED TOTALS

Total Hours	1,288.60
Fee Total, all Matters	\$ 1,155,705.00
Disbursement Total, all Matters	\$ 28,242.41
Invoice Total, all Matters	<u>\$ 1,183,947.41</u>

First Guaranty Mortgage Corporation  
Attn: Aaron Samples  
5800 Tennyson Parkway, Suite 450  
Plano TX 75024  
United States

November 23, 2022

Client #: 15810756

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Statement of Account

According to our records, as of November 23, 2022, the amounts shown below are outstanding.  
If your records are not in agreement with ours, please call us. Thank you.

Payments/

Total Outstanding Invoices \$32.99

Questions should be directed to:

S. Maizel  
at 1 213 623 9300

Federal Tax I.D. Number 36-1796730

**Dentons US LLP Third Monthly Fee Application**

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re:

FIRST GUARANTY MORTGAGE  
CORPORATION, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-10584 (CTG)

(Jointly Administered)

Objection Deadline: December 21, 2022, at 4:00  
p.m. (prevailing Eastern Time)

**SUMMARY OF THIRD MONTHLY FEE APPLICATION OF  
DENTONS US LLP AS COUNSEL FOR THE DEBTORS AND  
DEBTORS IN POSSESSION, FOR ALLOWANCE  
OF COMPENSATION AND REIMBURSEMENT OF EXPENSES  
FOR THE PERIOD FROM SEPTEMBER 1, 2022 THROUGH SEPTEMBER 30, 2022**

General Information	
Name of Applicant:	Dentons US LLP
Authorized to Provide Services to:	Debtors and Debtors in Possession
Date of Retention:	Effective to June 30, 2022, by order signed on August 2, 2022
Period for Which Compensation and Expense Reimbursement is Sought:	September 1, 2022, through September 30, 2022
Amount of Compensation Sought as Actual, Reasonable, and Necessary:	\$609,294.00
Amount of payment sought:	\$487,435.20
Amount of Expense Reimbursement Sought As Actual, Reasonable, and Necessary:	\$2,567.83

This is a ✓ monthly                      interim      final application.

This is Dentons's third monthly fee application.

<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's tax identification number, are: First Guaranty Mortgage Corporation (9575); and Maverick II Holdings, LLC (5621). The location of the corporate headquarters and the service address for First Guaranty Mortgage Corporation is 5800 Tennyson Parkway, Suite 450, Plano, TX 75024.

**Prior Fee Applications filed.**

Date Filed	Period Covered	Requested Fees	Requested Expenses	Approved Fees	Approved Expenses
10/17/2022	June 30, 2022 - July 31, 2022	\$1,581,348.00	\$3,915.98	\$1,264,078.40	\$3,915.98
11/23/2022	August 1, 2022 - August 31, 2022	\$1,155,705.00	28,242.41		

**DUS PROFESSIONALS**

Name of Professional Individual	Position of the Applicant, Year of Obtaining License to Practice, Year of Joining the Firm	Department	Hourly Billing Rate	Total Interim Hours Billed	Total Interim Compensation
Claude D. Montgomery	Partner - Admitted to the Bar in 1984; Joined the Firm in 2002	Restructuring Insolvency & Bankruptcy	\$1,210	128.00	\$154,880.00
Lynn P. Harrison, III	Partner - Admitted to the Bar in 1984; Joined the Firm in 2020	Restructuring Insolvency & Bankruptcy	\$1,140	1.90	\$2,166.00
Jeffrey J. Murphy	Partner - Admitted to the Bar in 1984; Joined the Firm in 1985	Capital Markets	\$1,045	2.70	\$2,821.50
Richard C. Williams	Partner - Admitted to the Bar in 2007; Joined the Firm in 2010	Tax	\$1,040.00	3.90	\$4,056.00
E. Lee Smith	Partner - Admitted to the Bar in 1986; Joined the Firm in 2003	Capital Markets	\$1,025	16.60	\$17,015.00
Sam J. Alberts	Partner - Admitted to the Bar in 1993; Joined the Firm in 2011	Restructuring Insolvency & Bankruptcy	\$990	24.00	\$23,760.00
Sandra McCandless	Partner - Admitted to the Bar in 1973; Joined the Firm in 1994	Employment & Labor	\$985	45.00	\$44,325.00
Samuel R. Maizel	Partner - Admitted to the Bar in 1985; Joined the Firm in 2015	Restructuring Insolvency & Bankruptcy	\$970	73.10	\$70,907.00
Lee P. Whidden	Partner - Admitted to the Bar in 1989; Joined the Firm in 2002	Restructuring Insolvency & Bankruptcy	\$970	6.80	\$6,596.00
Roger K. Heidenreich	Partner - Admitted to the Bar in 1983; Joined the Firm in 1983	Commercial Litigation	\$930	13.10	\$12,183.00
Christopher D. O'Leary	Partner - Admitted to the Bar in 2009; Joined the Firm in 2014	Capital Markets	\$850	26.40	\$22,440.00

<b>Name of Professional Individual</b>	<b>Position of the Applicant, Year of Obtaining License to Practice, Year of Joining the Firm</b>	<b>Department</b>	<b>Hourly Billing Rate</b>	<b>Total Interim Hours Billed</b>	<b>Total Interim Compensation</b>
Tania M. Moyron	Partner - Admitted to the Bar in 2005; Joined the Firm in 2017	Restructuring Insolvency & Bankruptcy	\$790	133.90	\$105,781.00
Sanpreet Dhaliwal	Senior Managing Associate - Admitted to the Bar in 2016; Joined the Firm in 2022	Tax	\$780	9.60	\$7,488.00
Geoffrey M. Miller	Partner - Admitted to the Bar in 2012; Joined the Firm in 2014	Restructuring Insolvency & Bankruptcy	\$770	11.20	\$8,624.00
Lauren M. Macksoud	Partner - Admitted to the Bar in 2003; Joined the Firm in 2017	Restructuring Insolvency & Bankruptcy	\$770	17.70	\$13,629.00
John A. Moe, II	Partner - Admitted to the Bar in 1975; Joined the Firm in 2008	Restructuring Insolvency & Bankruptcy	\$760	12.10	\$9,196.00
Casey W. Doherty, Jr.	Senior Managing Associate - Admitted to the Bar in 2011; Joined the Firm in 2021	Restructuring Insolvency & Bankruptcy	\$695	19.20	\$13,344.00
Eric Oliver	Managing Associate - Admitted to the Bar in 2015; Joined the Firm in 2021	Capital Markets	\$655	12.10	\$7,925.50
Sarah M. Schrag	Managing Associate - Admitted to the Bar in 2016; Joined the Firm in 2016	Restructuring Insolvency & Bankruptcy	\$650	19.90	\$12,935.00
David F. Cook	Managing Associate - Admitted to the Bar in 2017; Joined the Firm in 2019	Restructuring Insolvency & Bankruptcy	\$620	52.40	\$32,488.00
Jessica Peterson	Associate - Admitted to the Bar in 2019; Joined the Firm in 2022	Employment & Labor	\$525	25.20	\$13,230.00
Samantha Ruben	Associate - Admitted to the Bar in 2019; Joined the Firm in 2021	Restructuring Insolvency & Bankruptcy	\$525	9.70	\$5,092.50
Michael E. Harriss	Senior Managing Associate - Admitted to the Bar in 2014; Joined the Firm in 2018	Commercial Litigation	\$455	19.10	\$8,690.50
George L. Medina	Senior Paralegal	Restructuring Insolvency & Bankruptcy	\$360	21.50	\$7,740.00
Elizabeth S. Cobarrubias	Senior Research Specialist	Knowledge/Practice Innovation	\$350	0.30	\$105.00
Mica L. Maddry	Research Specialist	Knowledge/Practice Innovation	\$350	1.0	\$350.00
Kathryn Howard	Senior Paralegal	Restructuring Insolvency & Bankruptcy	\$340	4.30	\$1,462.00
Jack I. Milko	Paralegal	Capital Markets	\$320	0.20	\$64.00

**Grand Total: \$609,294.00**  
**Total Hours 710.90**  
**Blended Rate: \$857.07**

**COMPENSATION BY PROJECT CATEGORY**

<b>Task Code</b>	<b>Matter Description</b>	<b>Total Hours Billed</b>	<b>Total Fees Requested</b>
B110	Case Administration	40.10	\$32,310.00
B120	Asset Analysis and Recovery	4.40	\$3,828.00
B130	Asset Disposition	45.40	\$36,941.50
B140	Relief from Stay/Adequate Protection Proceedings	3.40	\$1,404.00
B150	Meetings of/and Communications with Creditors	19.20	\$20,060.00
B160	Fee/Employment Applications	33.20	\$18,431.00
B185	Assumption/Rejection of Leases and Contracts	32.00	\$31,531.00
B190	Other Contested Matters (excl. assumption/rejection motions)	31.70	\$26,569.50
B195	Non-Working Travel	0.00	\$0.00
B210	Business Operations	0.70	\$455.00
B220	Employee Benefits/Pension	63.70	\$52,366.50
B230	Financing/Cash Collections	139.00	\$135,528.50
B240	Tax Issue	15.10	\$13,480.00
B260	Board of Directors Matters	13.20	\$13,583.00
B300	Claims and Plan	23.80	\$16,148.00
B310	Claims Administration and Objections	9.90	\$6,034.50
B320	Plan and Disclosure Statement (incl. Business Plan	157.90	\$142,887.00
B400	Bankruptcy-Related Advice	7.50	\$7,135.00
B410	General Bankruptcy Advice/Opinions	1.0	\$350.00
EMP	Employee matters	57.80	\$40,679.00
INS	Insurance	0.60	\$474.00
WARNACT	Warn Act Issues	11.30	\$9,098.50
<b>Total</b>		<b>710.9</b>	<b>\$609,294.00</b>

**EXPENSE SUMMARY**

<b>Expense Category</b>	<b>Service Provider (if applicable)</b>	<b>Total Expenses</b>
Litigation Support Vendors	Pacer Service Center	\$549.00
Outside Professional Services	Dentons Bingham Greenebaum invoice 4529545 for professional services rendered through August 31, 2022.	\$1,088.00
Research Fees (Lexis)	Claude D. Montgomery	\$715.75
	Mica L. Maddry	\$54.28
Research Fees (Westlaw)	Jessica Peterson	\$150.00
Transcript Services	Transcript Services - Certified Transcript	10.80
<b>Total Disbursements Requested</b>		<b>\$2,567.83</b>

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FIRST GUARANTY MORTGAGE  
CORPORATION, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-10584 (CTG)

(Jointly Administered)

Objection Deadline: December 21, 2022 at 4:00 p.m.  
(prevailing Eastern Time)

**SUMMARY OF THIRD MONTHLY FEE APPLICATION OF  
DENTONS US LLP AS COUNSEL FOR THE DEBTORS AND  
DEBTORS IN POSSESSION, FOR ALLOWANCE  
OF COMPENSATION AND REIMBURSEMENT OF EXPENSES  
FOR THE PERIOD FROM SEPTEMBER 1, 2022 THROUGH SEPTEMBER 30, 2022**

Pursuant to §§ 330 and 331 of title 11 of the United States Code (the “Bankruptcy Code”) and Rule 2016 of the Federal Rules of Bankruptcy Procedure (collectively, the “Bankruptcy Rules”), and the *Order (I) Approving Procedures for (A) Interim Compensation and Reimbursement of Expenses of Retained Professionals and (B) Expense Reimbursement for Official Committee Members and (II) Granting Related Relief* [Docket No. 268] entered on August 2, 2022 (the “Administrative Order”), Dentons US LLP (“DUS” or the “Firm”), counsel to the debtors and the debtors in possession in the above-captioned cases (the “Debtors”), hereby submits its *Third Monthly Application for Compensation and for Reimbursement of Expenses for the Period from September 1, 2022 through September 30, 2022* (the “Application”).

By this Application, DUS seeks a monthly interim allowance of compensation in the amount of \$609,294.00 and actual and necessary expenses in the amount of \$2,567.83 for a total allowance

<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s tax identification number, are: First Guaranty Mortgage Corporation (9575); and Maverick II Holdings, LLC (5621). The location of the corporate headquarters and the service address for First Guaranty Mortgage Corporation is 5800 Tennyson Parkway, Suite 450, Plano, TX 75024.

of \$611,861.83 and payment of \$487,435.20 (80% of the allowed fees) and reimbursement of \$2,567.83 (100% of the allowed expenses) for a total payment of \$490,003.03 for the period from September 1, 2022, through September 30, 2022 (the “Interim Period”). In support of this Application, DUS respectfully represents as follows:

### **Background**

1. On June 30, 2022 (the “Petition Date”), the Debtors filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code. The Debtors operated and managed their businesses as debtors in possession pursuant to §§ 1107(a) and 1108 of the Bankruptcy Code, and the Court confirmed the Amended Combined Disclosure Statement and Chapter 11 Plan by order entered November 2, 2022 [Docket No. 671]. No trustee or examiner has been appointed in the Debtors’ chapter 11 cases.

2. The Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2).

3. The Administrative Order authorizes certain professionals (“Professionals”) to submit monthly applications for interim compensation and reimbursement for expenses, pursuant to the procedures specified therein. The Administrative Order provides, among other things, that a Professional may submit monthly fee applications. If no objections are made within fourteen (14) days after service of the monthly fee application the Debtors are authorized to pay the Professional eighty percent (80%) of the requested fees and one hundred percent (100%) of the requested expenses. Beginning with the period ending September 30, 2022, and at three-month intervals thereafter, each of the Professionals shall file and serve an interim application for allowance of the amounts sought in its monthly fee applications for that period. All fees and expenses paid are on an interim basis until final allowance by the Court.

4. The Court approved the retention of DUS, effective as of June 30, 2022, by its *Order Authorizing and Approving the Retention of Dentons US LLP as Counsel to the debtors and debtors in possession Effective as of June 30, 2022* [Docket No. 277] (the “Retention Order”). The Retention Order authorized DUS to be compensated on an hourly basis and to be reimbursed for actual and necessary out-of-pocket expenses.

**DUS APPLICATION FOR COMPENSATION  
AND FOR REIMBURSEMENT OF EXPENSES**

5. All services for which DUS requests compensation were performed for or on behalf of the Debtors.

6. DUS has received no payment and no promises for payment from any source other than the Debtors for services rendered or to be rendered in any capacity whatsoever in connection with the matters covered by this Application. There is no agreement or understanding between DUS and any other person other than the partners of DUS for the sharing of compensation to be received for services rendered in these chapter 11 cases.

**Fee Statements**

7. The fee statement for the Interim Period is attached hereto as **Exhibit A**. This statement contains daily time logs describing the time spent by each attorney and paraprofessional during the Interim Period. To the best of DUS’ knowledge, this Application complies with §§ 330 and 331 of the Bankruptcy Code and the Bankruptcy Rules. DUS’ time reports are initially handwritten by the attorney or paralegal performing the described services. The time reports are organized daily. DUS is particularly sensitive to issues of “lumping” and unless time was spent in a one-time frame on a variety of different matters for a particular client, separate time entries are outlined in the time reports. DUS’s charges for its professional services are based upon the time,

nature, extent, and value of such services and the cost of comparable services other than in a case under the Bankruptcy Code.

#### **Actual and Necessary Expenses**

8. A summary of actual and necessary expenses incurred by DUS for the Interim Period is attached hereto as part of **Exhibit A**. DUS represents that: (i) it does not charge for internal printing; (ii) it does not charge for outgoing or incoming facsimile transmissions in bankruptcy matters; and (iii) with respect to providers of on-line legal research services (e.g., LEXIS and WESTLAW), there is no surcharge for computerized legal research.

9. DUS believes the foregoing rates are the market rates that the majority of law firms charge clients for such services. In addition, DUS believes that such charges are in accordance with the American Bar Association's ("**ABA**") guidelines, as set forth in the ABA's Statement of Principles, dated January 12, 1995, regarding billing for disbursements and other charges.

#### **Summary of Services Rendered**

10. The names of the partners and associates of DUS who have rendered professional services in these chapter 11 cases during the Interim Period, as well as the paralegals and research assistants of DUS who provided services to these attorneys during the Interim Period, are set forth in the attached **Exhibit A**.

11. DUS by and through such persons, has prepared and assisted in the preparation of various motions and orders submitted to the Court for consideration, and advised the Debtors on a regular basis with respect to various matters in connection with the Debtors' chapter 11 cases, and performed all necessary professional services which are described and narrated in detail below. DUS's efforts were extensive due to the size and complexity of the Debtors' chapter 11 cases.

### **Summary of Services by Project**

12. The services rendered by DUS during the Interim Period can be grouped into the categories set forth below. DUS attempted to place the services provided in the category that best relates to such services. However, because certain services may relate to one or more categories, services pertaining to one category may in fact be included in another category. These services, performed by categories, are generally described below, with a more detailed identification of the actual services provided set forth on the attached **Exhibit A**. **Exhibit A** identifies the attorneys and paraprofessionals who rendered services relating to each category, along with the number of hours for each individual and the total compensation sought for each category.

13. **Case Administration B110** This category includes, but is not limited to, DUS' attention to administrative matters regarding an array of topics, including work relating to hearings and related deadlines, conference calls from parties-in-interest relating to general case matters, work relating to requests for information from the Official Committee of Unsecured Creditors ("**UCC**") and the UCC's financial advisors, attention to research issues, work relating to employee administrative issues, internal and external telephone and video conferences concerning case issues, including applicability of default interest and settlement efforts with Fannie Mae, TIAA and Mass Mutual (all as defined below), among other parties, analysis concerning plan and disclosure statement issues, analysis of a critical dates memorandum, analysis of inquiries from former employees, analysis of a general framework for claims review, analysis and attention to ordinary course business and professional issues, and analysis and attention to case management framework and corresponding issues.

**Fees: \$32,310.00      Hours: 40.10**

14. **Asset Analysis and Recovery B120:** This category includes, but is not limited to, DUS’ work relating to the Debtors’ settlement with the Federal National Mortgage Association (“Fannie Mae”), bid procedures issues, and issues relating to loan liquidations regarding Customers Bank.

**Fees: \$3,828.00      Hours: 4.40**

15. **Asset Disposition B130:** This category includes, but is not limited to, DUS’ services related to asset sales and related issues with regard to both substance and process, including preparation and attention to a sale/bid procedures motion, a corresponding motion to shorten notice, and other pleadings in connection therewith; services related to holdback and setoff analyses, licensing matters, issues concerning TIAA, FSB (“TIAA”) and STRATMOR Capital, Inc. (“Stratmor”), issues with warehouse lenders, issues relating to loan servicing, analysis and attention to issues in connection with BSI Financial Services, analysis and attention to sub-servicer segregation and collections issues, preparation of, and attention to, letter of intent and teaser materials in connection with asset sale efforts, analysis and attention to intersection of asset sale efforts with plan and disclosure statement process, review and comment on draft mortgage loan sale agreements, and analysis and attention to loan remittance issues.

**Fees: \$36,941.50      Hours: 45.40**

16. **Relief from Stay / Adequate Protection Proceedings B140:** This category includes, but is not limited to, DUS’ work relating to a potential sheriff’s sale of property subject to the Debtors’ first lien and work relating to preparation of a notice of bankruptcy and automatic stay in connection with a Texas state court proceeding concerning the Debtors.

**Fees: \$1,404.00      Hours: 3.40**

17. **Meetings Of and Communications With Creditors B150:** This category includes, but is not limited to, DUS’ work relating to meetings with the advisors to the UCC concerning settlement issues and information requests, and responding to creditor inquiries.

**Fees: \$20,060.00      Hours: 19.20**

18. **Fee / Employment Applications B160:** This category includes, but is not limited to, DUS’ work in connection with employment related matters, including the preparation of DUS’ first monthly fee application, attention to the retention application of Berkeley Research Group, LLC, attention to the retention of ordinary course professionals, and attention to the engagement of Stratmor.

**Fees: \$18,431.00      Hours: 33.20**

19. **Assumptions / Rejection Of Leases And Contracts B185:** This category includes, but is not limited to, DUS’ work relating to the evaluation and analysis of the assumption/and or rejection of executory contracts and leases, work relating to the preparation and analysis of pleadings relating thereto, work relating to lease issues with Optimal Blue, LLC, work relating to notice letters for Mass Mutual Life Insurance Company (“Mass Mutual”) and TIAA, and work relating to servicing issues.

**Fees: \$31,531.00      Hours: 32.00**

20. **Other Contested Matters B190:** This category includes, but is not limited to, DUS’ work relating to contested issues with regard to alleged WARN Act liability of the Debtors, employment issues, discovery issues, settlement issues concerning Fannie Mae and the Federal Home Loan Mortgage Corporation (“Freddie Mac”), and False Claims Act litigation issues.

**Fees: \$26,569.50      Hours: 31.70**

21. **Business Operations B210:** This category includes, but is not limited to, DUS' work relating to issues pertaining to ordinary course professionals.

**Fees: \$455.00      Hours: 0.70**

22. **Employee Benefits / Pension B220:** This category includes, but is not limited to, DUS' services relating to disputes concerning alleged WARN Act liability of the Debtors, analysis of, and attention to, third party employment lawsuits, including with regard to violation of automatic stay, analysis of plan provisions and intersection with employee and WARN Act claims, preparation of and attention to draft employee wage order, analysis of estimation proceeding issues, preparation of answer to class action WARN Act complaint, analysis of potential WARN Act damages and attention to related information, analysis of employee files and related factual information in support of draft answer to class action WARN Act complaint, and internal and external communications regarding WARN Act litigation.

**Fees: \$52,366.50      Hours: 63.70**

23. **Financing / Cash Collections B230:** This category includes, but is not limited to, DUS' work relating to complex financing matters that were critical to the Debtors' successes in these chapter 11 cases. Among other things, DUS focused its attention on negotiating and resolving objections and issues in connection with such financing, as well as researching complex issues in connection with interest upon such financing. DUS dealt with issues stemming from the intersection of the Debtors' financing and their proposed plan and disclosure statement structure, as well as servicing issues regarding BSI Financial Services. DUS provided services relating to disputes, including those raised by the Debtors' warehouse lenders in connection with the aforementioned financing, including research and analysis regarding such issues. Also in this

category of service, DUS reviewed cash flow projections, and conferred with the Debtors, FTI, and other third parties on the foregoing.

**Fees: \$135,528.50      Hours: 139.00**

24. **Tax Issues B240:** This category includes, but is not limited to, DUS' work on preservation and transfer issues related to Net Operating Loss ("NOL"), structure alternatives including researching limitations on NOLs for creditors and stockholders acquiring NOLs through a chapter 11 process.

**Fees: \$13,480.00      Hours: 15.10**

25. **Board of Directors Matters B260:** This category includes, but is not limited to, DUS' work preparing for, attending, and making presentations to the Debtors' Board of Directors concerning case issues.

**Fees: \$13,583.00      Hours: 13.20**

26. **Claims And Plan B300:** This category includes, but is not limited to, DUS' work in connection with conferences with FTI on plan issues, analysis of a draft plan, comments on and revisions to a draft plan, and consideration of the inter-relationship between the plan and various claims and other considerations.

**Fees: \$16,148.00      Hours: 23.80**

27. **Claims Administration And Objections B310:** This category includes, but is not limited to, DUS' work relating to analyzing and evaluating claims concerning, among other things, critical vendor issues, surety bond issues, employee issues, and qui tam issues.

**Fees: \$6,034.50      Hours: 9.90**

28. **Plan And Disclosure Statement B320:** This category includes, but is not limited to, DUS' work relating to conferences with the Debtors and their professionals on plan issues,

analysis of a proposed plan and disclosure statement and various potential structures, preparation of a combined plan and disclosure statement, consideration of reorganization transaction costs, review of claim classification and other related matters, consideration of cash distributions, consideration of state licenses, review of a timeline for a plan and sale process, analysis of interest rate issues, analysis concerning UCC's objection to notice period and related issues, analysis of, and response to, disclosure statement objections, analysis of plan and disclosure statement comments, draft plan and disclosure statement language to address concerns of parties-in-interest including WARN Act claimants, agencies, lenders, and others, negotiations with UCC regarding global settlement, negotiations with Fannie Mae, Freddie Mac, and other parties regarding settlements, and participation in hearing concerning disclosure statement.

**Fees: \$142,887.00      Hours: 157.90**

29. **Bankruptcy Related Advice B400:** This category includes, but is not limited to, DUS' work relating to general bankruptcy advice, including with regard to contract treatment, plan and disclosure statement implications, information requests, and settlement proposals.

**Fees: \$7,135.00      Hours: 7.50**

30. **General Bankruptcy Advice / Opinions B410:** This category includes, but is not limited to, DUS' work relating to retrieval of certain pertinent documents not otherwise electronically available.

**Fees: \$350.00      Hours: 1.0**

31. **Employee Matters EMP:** This category includes, but is not limited to, DUS' work relating to various employment matters, including in connection with alleged WARN Act liability of the Debtors, as well as employment matters more generally.

**Fees: \$40,679.00      Hours: 57.80**

32. **Insurance INS:** This category includes, but is not limited to, DUS' work relating to its analysis of surety bonds.

**Fees: \$474.00      Hours: 0.60**

33. **WARN ACT:** This category includes, but is not limited to, DUS' work relating to WARN Act litigation and Answer to WARN Act class action complaint and review of employee WARN Act proofs of claim.

**Fees: \$9,098.50      Hours: 11.30**

### **DUS PROFESSIONALS**

34. Attorneys and paraprofessionals of DUS expended a total of 710.90 hours in connection with their representation of the Debtors during the Interim Period, as follows:

<b>Name of Professional Individual</b>	<b>Position of the Applicant, Year of Obtaining License to Practice, Year of Joining the Firm</b>	<b>Department</b>	<b>Hourly Billing Rate</b>	<b>Total Interim Hours Billed</b>	<b>Total Interim Compensation</b>
Claude D. Montgomery	Partner - Admitted to the Bar in 1984; Joined the Firm in 2002	Restructuring Insolvency & Bankruptcy	\$1,210	128.00	\$154,880.00
Lynn P. Harrison, III	Partner - Admitted to the Bar in 1984; Joined the Firm in 2020	Restructuring Insolvency & Bankruptcy	\$1,140	1.90	\$2,166.00
Jeffrey J. Murphy	Partner - Admitted to the Bar in 1984; Joined the Firm in 1985	Capital Markets	\$1,045	2.70	\$2,821.50
Richard C. Williams	Partner - Admitted to the Bar in 2007; Joined the Firm in 2010	Tax	\$1,040.00	3.90	\$4,056.00
E. Lee Smith	Partner - Admitted to the Bar in 1986; Joined the Firm in 2003	Capital Markets	\$1,025	16.60	\$17,015.00
Sam J. Alberts	Partner - Admitted to the Bar in 1993; Joined the Firm in 2011	Restructuring Insolvency & Bankruptcy	\$990	24.00	\$23,760.00
Sandra McCandless	Partner - Admitted to the Bar in 1973; Joined the Firm in 1994	Employment & Labor	\$985	45.00	\$44,325.00
Samuel R. Maizel	Partner - Admitted to the Bar in 1985; Joined the Firm in 2015	Restructuring Insolvency & Bankruptcy	\$970	73.10	\$70,907.00
Lee P. Whidden	Partner - Admitted to the Bar in 1989; Joined the Firm in 2002	Restructuring Insolvency & Bankruptcy	\$970	6.80	\$6,596.00

<b>Name of Professional Individual</b>	<b>Position of the Applicant, Year of Obtaining License to Practice, Year of Joining the Firm</b>	<b>Department</b>	<b>Hourly Billing Rate</b>	<b>Total Interim Hours Billed</b>	<b>Total Interim Compensation</b>
Roger K. Heidenreich	Partner - Admitted to the Bar in 1983; Joined the Firm in 1983	Commercial Litigation	\$930	13.10	\$12,183.00
Christopher D. O'Leary	Partner - Admitted to the Bar in 2009; Joined the Firm in 2014	Capital Markets	\$850	26.40	\$22,440.00
Tania M. Moyron	Partner - Admitted to the Bar in 2005; Joined the Firm in 2017	Restructuring Insolvency & Bankruptcy	\$790	133.90	\$105,781.00
Sanpreet Dhaliwal	Senior Managing Associate - Admitted to the Bar in 2016; Joined the Firm in 2022	Tax	\$780	9.60	\$7,488.00
Geoffrey M. Miller	Partner - Admitted to the Bar in 2012; Joined the Firm in 2014	Restructuring Insolvency & Bankruptcy	\$770	11.20	\$8,624.00
Lauren M. Macksoud	Partner - Admitted to the Bar in 2003; Joined the Firm in 2017	Restructuring Insolvency & Bankruptcy	\$770	17.70	\$13,629.00
John A. Moe, II	Partner - Admitted to the Bar in 1975; Joined the Firm in 2008	Restructuring Insolvency & Bankruptcy	\$760	12.10	\$9,196.00
Casey W. Doherty, Jr.	Senior Managing Associate - Admitted to the Bar in 2011; Joined the Firm in 2021	Restructuring Insolvency & Bankruptcy	\$695	19.20	\$13,344.00
Eric Oliver	Managing Associate - Admitted to the Bar in 2015; Joined the Firm in 2021	Capital Markets	\$655	12.10	\$7,925.50
Sarah M. Schrag	Managing Associate - Admitted to the Bar in 2016; Joined the Firm in 2016	Restructuring Insolvency & Bankruptcy	\$650	19.90	\$12,935.00
David F. Cook	Managing Associate - Admitted to the Bar in 2017; Joined the Firm in 2019	Restructuring Insolvency & Bankruptcy	\$620	52.40	\$32,488.00
Jessica Peterson	Associate - Admitted to the Bar in 2019; Joined the Firm in 2022	Employment & Labor	\$525	25.20	\$13,230.00
Samantha Ruben	Associate - Admitted to the Bar in 2019; Joined the Firm in 2021	Restructuring Insolvency & Bankruptcy	\$525	9.70	\$5,092.50
Michael E. Harriss	Senior Managing Associate - Admitted to the Bar in 2014; Joined the Firm in 2018	Commercial Litigation	\$455	19.10	\$8,690.50
George L. Medina	Senior Paralegal	Restructuring Insolvency & Bankruptcy	\$360	21.50	\$7,740.00
Elizabeth S. Cobarrubias	Senior Research Specialist	Knowledge/Practice Innovation	\$350	0.30	\$105.00
Mica L. Maddry	Research Specialist	Knowledge/Practice Innovation	\$350	1.0	\$350.00

Name of Professional Individual	Position of the Applicant, Year of Obtaining License to Practice, Year of Joining the Firm	Department	Hourly Billing Rate	Total Interim Hours Billed	Total Interim Compensation
Kathryn Howard	Senior Paralegal	Restructuring Insolvency & Bankruptcy	\$340	4.30	\$1,462.00
Jack I. Milko	Paralegal	Capital Markets	\$320	0.20	\$64.00

**Grand Total: \$609,294.00**  
**Total Hours 710.9**  
**Blended Rate: \$857.07**

35. The nature of services performed by these persons is fully set forth in **Exhibit A** attached hereto. The rates reflect DUS's normal hourly rates for work of this character. The reasonable value of the services rendered by DUS for the Debtors during the Interim Period is \$609,294.00.

36. In accordance with the factors enumerated in § 330 of the Bankruptcy Code, it is respectfully submitted that the amount requested by DUS is fair and reasonable given (a) the complexity of these chapter 11 cases, (b) the time expended, (c) the nature and extent of the services rendered, (d) the value of such services, and (e) the costs of comparable services other than in a case under the Bankruptcy Code. Moreover, DUS has reviewed the requirements of Del. Bankr. LR 2016-2 and the Administrative Order and believes that this Application complies with such Rule and Order.

WHEREFORE, DUS respectfully requests that the Court enter an order providing that, for the period from September 1, 2022, through September 30, 2022, an interim allowance be made to DUS for compensation in the amount of \$609,294.00 and actual and necessary expenses in the amount of \$2,567.83 for a total allowance of \$611,861.83 and payment of \$487,435.20 (80% of the allowed fees) and reimbursement of \$2,567.83 (100% of the allowed expenses) be authorized for a total payment of \$490,003.03; and for such other and further relief as this Court deems proper.

Dated: November 30, 2022  
Wilmington, Delaware

**PACHULSKI STANG ZIEHL & JONES LLP**

/s/ Mary F. Caloway

Laura Davis Jones (DE Bar No. 2436)  
Timothy P. Cairns (DE Bar No. 4228)  
Mary F. Caloway (DE Bar No. 3059)  
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-and-

Samuel R. Maizel (admitted *pro hac vice*)  
Tania M. Moyron (admitted *pro hac vice*)

**DENTONS US LLP**

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Email: [david.f.cook@dentons.com](mailto:david.f.cook@dentons.com)

*Counsel for Debtors and Debtors in Possession*

**DECLARATION**

STATE OF CALIFORNIA            )  
                                                  ) ss.  
COUNTY OF LOS ANGELES    )

I, Samuel M. Maizel, hereby certify as follows:

1. I am a partner in the applicant firm, Dentons US LLP (“DUS”), and have been admitted to appear before this Court *pro hac vice*.

2. I have personally performed many of the legal services rendered by DUS, as counsel for the Debtors, and am thoroughly familiar with all other work performed on behalf of the Debtors by the lawyers and paraprofessionals in the firm.

3. The facts set forth in the foregoing Application are true and correct to the best of my knowledge, information, and belief. Moreover, I have reviewed the requirements of Rule 2016-2 of the Local Rules of Practice and Procedure of the United States Bankruptcy Court for the District of Delaware and submit that the Application complies with such requirements.

Dated: November 30, 2022

/s/ Samuel M. Maizel  
/s/ Samuel M. Maizel

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FIRST GUARANTY MORTGAGE  
CORPORATION, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-10584 (CTG)

(Jointly Administered)

**Objection Deadline: December 21, 2022, at 4:00  
p.m. (prevailing Eastern Time)**

**NOTICE OF FILING FEE APPLICATION**

**PLEASE TAKE NOTICE** that Dentons US LLP (“DUS”), counsel to the debtors and debtors in possession (the “Debtors”), in the above-captioned cases, has filed its *Third Monthly Application for Compensation and Reimbursement of Expenses of Dentons US LLP, as Counsel to the Debtors’ for the Period from September 1, 2022 through September 30, 2022* (the “Application”) seeking fees in the amount of \$609,294.00 and reimbursement of actual and necessary expenses in the amount of \$2,567.83 for the period from September 1, 2022 through September 30, 2022.

**PLEASE TAKE FURTHER NOTICE** that any objection or response to the Application must be made in writing and be filed with the United States Bankruptcy Court for the District of Delaware (the “Bankruptcy Court”), 824 N. Market Street, 3rd Floor, Wilmington, Delaware 19801, on or before **December 21, 2022, at 4:00 p.m. prevailing Eastern Time.**

**PLEASE TAKE FURTHER NOTICE** that at the same time, you must also serve a copy of the response or objection upon: (i) counsel for the Debtors: (a) Dentons US LLP, 601 S.

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<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s tax identification number, are: First Guaranty Mortgage Corporation (9575); and Maverick II Holdings, LLC (5621). The location of the corporate headquarters and the service address for First Guaranty Mortgage Corporation is 5800 Tennyson Parkway, Suite 450, Plano, TX 75024.

Figueroa Street, #2500, Los Angeles, CA 90017 (Attn: Tania M. Moyron, [tania.moyron@dentons.com](mailto:tania.moyron@dentons.com), and Samuel Maizel, [samuel.maizel@dentons.com](mailto:samuel.maizel@dentons.com)) and (b) Pachulski Stang Ziehl & Jones LLP, 919 North Market Street, 17th Floor, Wilmington, Delaware 19801 (Attn: Laura Davis Jones, [ljones@pszjlaw.com](mailto:ljones@pszjlaw.com)); (ii) Barclays Bank PLC: Hunton Andrews Kurth LLP, 200 Park Avenue, New York, NY 10166 (Attn: Peter S. Partee, [ppartee@huntonak.com](mailto:ppartee@huntonak.com)) and (Brian M. Clarke, [brianclarke@huntonak.com](mailto:brianclarke@huntonak.com)); and Potter Anderson & Corroon LLP, 1313 N. Market Street, 6th Floor, Wilmington, Delaware, 19801 (Attn. Jeremy W Ryan, [jryan@potteranderson.com](mailto:jryan@potteranderson.com)); (iii) counsel to LVS II SPE XXXIV LLC, Greenberg Traurig, LLP., (Attn: Nancy Peterman, [PetermanN@gtlaw.com](mailto:PetermanN@gtlaw.com)), (John D. Elrod, [ElrodJ@gtlaw.com](mailto:ElrodJ@gtlaw.com)), (Joseph Davis [DavisJ@gtlaw.com](mailto:DavisJ@gtlaw.com)), and (Danny Duerdoth, [duerdothD@gtlaw.com](mailto:duerdothD@gtlaw.com)); (iv) the Office of the United States Trustee, 844 King Street, Suite 2207 Lockbox 35, Wilmington, DE 19801, (Attn: Benjamin Hackman [benjamim.a.hackman@usdoj.gov](mailto:benjamim.a.hackman@usdoj.gov)); and (v) counsel for the Official Committee of Unsecured Creditors, (a) Thompson Coburn Hahn & Hessen LLP, 488 Madison Avenue, New York, NY 10022 (Attn: Mark S. Indelicato [mindelicato@thompsoncoburn.com](mailto:mindelicato@thompsoncoburn.com)), (Mark T. Power [mpower@thompsoncoburn.com](mailto:mpower@thompsoncoburn.com)) and (Joseph Orbach [jorbach@thompsoncoburn.com](mailto:jorbach@thompsoncoburn.com)); and (b) Blank Rome LLP, 1201 Market Street, Suite 800, Wilmington, DE 19801 (Attn: Regina Stango Kelbon, [regina.kelbon@blankrome.com](mailto:regina.kelbon@blankrome.com)), (Victoria A. Guilfoyle, [tori.guilfoyle@blankrome.com](mailto:tori.guilfoyle@blankrome.com)) and (Lorenzo R. Thomas III, [Lorenzo.thomas@blankrome.com](mailto:Lorenzo.thomas@blankrome.com)).

**PLEASE TAKE FURTHER NOTICE** that on August 2, 2022, the Bankruptcy Court entered the *Order (I) Approving Procedures for (A) Interim Compensation and Reimbursement of Expenses of Retained Professionals* (the “Order”) [Docket No. 268].

Pursuant to the Order, in the absence of timely filed objections or responses, and upon the filing with the Bankruptcy Court of a certification of no objection, the Debtors are authorized to pay the professionals eighty percent (80%) of the fees, and one hundred percent (100%) of expenses without further notice or hearing. All fees and expenses paid to the professionals are subject to final approval by the Court.

**PLEASE TAKE FURTHER NOTICE THAT IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE APPLICATION WITHOUT FURTHER NOTICE OR HEARING.**

Dated: November 30, 2022  
Wilmington, Delaware

**PACHULSKI STANG ZIEHL & JONES LLP**

/s/ Mary F. Caloway

Laura Davis Jones (DE Bar No. 2436)  
Timothy P. Cairns (DE Bar No. 4228)  
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[tcairns@pszjlaw.com](mailto:tcairns@pszjlaw.com)  
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-and-

Samuel R. Maizel (admitted *pro hac vice*)  
Tania M. Moyron (admitted *pro hac vice*)  
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Lauren Macksoud (admitted *pro hac vice*)  
Claude D. Montgomery (admitted *pro hac vice*)  
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*Counsel for Debtors and Debtors in Possession*

**EXHIBIT A**

Fees

First Guaranty Mortgage Corporation  
Attn: Aaron Samples  
5800 Tennyson Parkway, Suite 450  
Plano TX 75024  
United States

November 30, 2022

**Invoice No. 2581314**

Client: 15810756

Payment Due Upon Receipt

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Total This Invoice	\$ 611,861.83
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Please return this page with your payment

In the case of mail deliveries to:

SNR Denton US LLP  
8000 Sears Tower  
Chicago, IL 60606

OR

In the case of overnight deliveries to:

SNR Denton US LLP  
Attention: Accounting  
233 South Wacker Drive  
Chicago, IL 60604-6404

Payment by wire transfer/ACH should be sent to:

Citi Private Bank  
227 W Monroe, Chicago, IL 60606  
ABA Transit # 271070801  
Account # 0801051693  
Account Name: Dentons US LLP  
Swift Code: CITIUS33

Reference Invoice # and/or client matter #

All payments must be in U.S. Dollars - Federal Tax I.D. Number 36-1796730

Questions relating to this invoice should be directed to:

S. Maizel  
at 1 213 623 9300



First Guaranty Mortgage Corporation  
Attn: Aaron Samples  
5800 Tennyson Parkway, Suite 450  
Plano TX 75024  
United States

November 30, 2022

**Invoice No. 2581314**

For Professional Services Rendered through September 30, 2022:

Matter: 15810756-000003  
First Guaranty Mortgage Corporation

B110 - Case Administration

Date	Timekeeper	Hours	Amount	Task	Narrative
09/01/22	S. Maizel	0.30	291.00	B110	Zoom conference with GT attorneys re UCC discovery.
09/02/22	S. Maizel	0.20	194.00	B110	Zoom conference with FTI, etc. re pending issues.
09/02/22	S. Maizel	0.50	485.00	B110	Zoom conference with D. Oien, etc. re pending legal issues.
09/02/22	J. Murphy	2.70	2,821.50	B110	Conference call with C. Montgomery et al re default interest under legacy repos and enforceability (.5); numerous emails and file memos re same (2.2).
09/03/22	S. Maizel	0.50	485.00	B110	Zoom conference with C. Montgomery, T. Moyron, etc. re TIAA and Mass. Mutual issues.
09/06/22	T. Moyron	0.10	79.00	B110	Correspond with M. Caloway re agenda for hearing.
09/07/22	D. Cook	0.20	124.00	B110	Email T. Moyron regarding amended agenda re hearing.
09/07/22	S. Maizel	0.30	291.00	B110	Zoom conference with D. Oien, etc. re recurring legal issues.
09/07/22	S. Maizel	0.40	388.00	B110	Zoom conference with L. Jones, etc. re hearing on Fannie Mae settlement.

First Guaranty Mortgage Corporation  
Matter: 15810756-000003  
Invoice No.: 2581314

November 30, 2022

Date	Timekeeper	Hours	Amount	Task	Narrative
09/07/22	K.M. Howard	1.70	578.00	B110	Email exchanges with T. Moyron regarding September 8th hearing (.1); analysis of Notice of Agenda (.2); review docket and assemble pleadings designated for hearing (.6); prepare indices of matters before the court (.4); email exchanges regarding hearing binders (.1); coordinate delivery of materials to S. Maizel and T. Moyron (.1); review and revise indices (.1); email exchanges regarding revisions (.1).
09/08/22	G. Medina	0.30	108.00	B110	Correspond with T. Moyron and S. Maizel and send Fannie Mae motions in preparation for hearing.
09/08/22	S. Alberts	0.50	495.00	B110	Review and assess C. Doherty response to WARN legal issues list (.2) and respond (.1), communication with client and co-counsel about remaining KEIP and KERP distributions and need for call (.2).
09/08/22	S. Maizel	0.50	485.00	B110	Zoom conference with M. Schwarzmman, etc. re pending issues.
09/08/22	S. Maizel	0.50	485.00	B110	Zoom conference with C. Montgomery, etc. re TIAA and Mass. Mutual issues.
09/08/22	S. Maizel	0.40	388.00	B110	Review and respond to emails re response to GNMA notice of violation.
09/09/22	S. Maizel	0.50	485.00	B110	Revising and sending response to GNMA re notice of violation.
09/09/22	S. Schrag	0.10	65.00	B110	Confer with D. Oien, J. John, T. Moyron, and J. Krasne regarding reoccurring call.
09/09/22	S. Schrag	0.30	195.00	B110	Review voicemail and leave voicemail for C. Stein at Watson Title Company regarding request for satisfaction of mortgage (.2); confer with S. Maizel and T. Moyron regarding the same (.1).
09/10/22	S. Maizel	0.50	485.00	B110	Telephone conference with PSZJ, etc. re upcoming hearing and related issues.
09/12/22	C. Doherty, Jr.	0.10	69.50	B110	Review Critical Dates memorandum prepared by local counsel.
09/14/22	S. Maizel	0.70	679.00	B110	Zoom conference with D. Oien, etc. re UCC discovery requests.
09/15/22	S. Schrag	0.20	130.00	B110	Review voicemail from creditor and confer with S. Alberts regarding the same.

First Guaranty Mortgage Corporation  
Matter: 15810756-000003  
Invoice No.: 2581314

November 30, 2022

Date	Timekeeper	Hours	Amount	Task	Narrative
09/16/22	S. Schrag	0.30	195.00	B110	Review voicemail from creditor and confer with S. Alberts regarding the same.
09/16/22	E. Cobarrubias	0.30	105.00	B110	Obtain copy of article in Dallas Morning news for John Moe.
09/19/22	S. Maizel	0.30	291.00	B110	Zoom conference with D. Oien, etc. re recurring legal issues.
09/19/22	S. Maizel	1.00	970.00	B110	Conference with A. Samples, T. Meerovich, etc. re pending issues.
09/19/22	S. Maizel	0.30	291.00	B110	Multiple telephone conference calls with T. Moyron re pending issues.
09/19/22	D. Cook	0.30	186.00	B110	Analyze inquiry from former employee about bankruptcy proceeding (.1); email correspondence with T. Moyron regarding same (.1); return same phone call (.1).
09/19/22	T. Moyron	0.90	711.00	B110	Teams meeting with A. Samples, E. Moser, D. Oien, S. Maizel, C. Montgomery, et al., re priority items including Committee, employee matters, etc.
09/19/22	C. Montgomery	0.90	1,089.00	B110	Participate in call with FTI, management and Dentons regarding priority items, including T. Meerovich, L. Manning, T. Moyron, A. Samples.
09/20/22	S. Maizel	0.50	485.00	B110	Zoom conference with T. Moyron, etc. re Barings issues.
09/21/22	S. Maizel	0.10	97.00	B110	Call with J. Jones, etc. re recurring legal issues.
09/21/22	C. Doherty, Jr.	2.20	1,529.00	B110	Call with S. Maizel, T. Moyron and S. Ruben regarding project of review of claims (.2); review and respond to emails concerning WARN and Plan strategy (.4); prepare for and attend call with L. Manning, T. Moyron, S. Alberts and others regarding WARN claims analysis and plan strategy (.8); research and send case concerning types of compensation and WARN claims (.2); follow up call with S. Ruben regarding claim review project and instruct re same (.2); call with S. Alberts regarding estimation strategy for WARN claims (.2); analyze employee and litigation claims sent by KCC (.2).

First Guaranty Mortgage Corporation  
Matter: 15810756-000003  
Invoice No.: 2581314

November 30, 2022

Date	Timekeeper	Hours	Amount	Task	Narrative
09/21/22	T. Moyron	1.10	869.00	B110	Call with Committee advisors (including M. Power, J. Vizzini, et al.), S. Maizel, C. Montgomery, T. Meerovich, et al., regarding budget, plan, and other matters.
09/21/22	T. Moyron	3.90	3,081.00	B110	Correspond and analyze matters related to DS and plan, WARN, and sale process.
09/23/22	T. Moyron	0.10	79.00	B110	Correspond with M. Hyland re Committee requests re call.
09/23/22	T. Moyron	0.30	237.00	B110	Call with T. Meerovich re responses to Committee requests, timing and plan, and other matters.
09/23/22	T. Moyron	0.40	316.00	B110	Conference call with D. Oien re pending issues, including sale matters, Committee requests, and other matters.
09/26/22	S. Schrag	0.10	65.00	B110	Participate in reoccurring call regarding issues.
09/28/22	S. Schrag	0.10	65.00	B110	Confer with D. Oien and J. John regarding today's reoccurring legal issues call.
09/28/22	T. Moyron	0.10	79.00	B110	Call with D. Oien regarding inquiry as impact of unsealing of False Claims Act complaint.
09/28/22	L. Macksoud	1.50	1,155.00	B110	Call with FGMC and FTI to discuss remittance issues (.6), draft demand letter to Planet Home (.4), and draft correspondence to Flagstar regarding required deliverable under lift stay order (.3), confer with C. Montgomery re same (.2).
09/29/22	L. Macksoud	3.00	2,310.00	B110	Review Planet Home MSR Purchase and Sale Agreements (.7), review emails from FGMC and FTI working group on repurchase requests and Holdback issues (.3), draft demand letter to Planet Home re same (.4) call with working group to talk through priority open items (1.0), call with J. John to discuss open issue with Multibank (.3), confer with C. Montgomery re request for sale accounting from Flagstar (.2), draft email to Flagstar re same (.1).

First Guaranty Mortgage Corporation  
Matter: 15810756-000003  
Invoice No.: 2581314

November 30, 2022

Date	Timekeeper	Hours	Amount	Task	Narrative
09/29/22	S. Schrag	0.60	390.00	B110	Review OCP correspondence (.1); review docket regarding the same (.1); confer with T. Cairns and G. Miller regarding declarations (.2); confer with T. Moyron regarding the same (.2).
09/29/22	T. Moyron	5.50	4,345.00	B110	Attention to plan and DS matters, WARN, and other case management matters (3.2); correspondence with T. Meerovich, et al., re case matters and calls re Customers and priority items (2.3).
09/29/22	S. Maizel	0.90	873.00	B110	Zoom conference with D. Oien, J. Johns, etc. re pending legal issues.
09/29/22	G. Miller	0.30	231.00	B110	Emails with J. John and M. Jacobson re additional loan level detail for loans referenced in schedules and statements.
09/30/22	S. Schrag	2.40	1,560.00	B110	Draft declarations for ordinary course professionals (1.9); confer with various counsel regarding execution of the same (.5).
09/30/22	S. Schrag	0.20	130.00	B110	Confer with D. Oien and J. Krasne during reoccurring call to discuss continuity during upcoming transitions (.1); confer with T. Moyron and S. Maizel regarding the same (.1).
09/30/22	L. Macksoud	1.00	770.00	B110	Finalize draft letter to Planet Home and confer with working group re same (.3), review documents transmitted to Multibank and draft email to Multibank regarding outstanding wire transfer (.5), call with Multibank compliance officer (.2).
Subtotal		40.10	32,310.00		

B120 - Asset Analysis and Recovery

Date	Timekeeper	Hours	Amount	Task	Narrative
09/01/22	G. Miller	0.30	231.00	B120	Review revisions to Fannie Mae motion to approve settlement.
09/01/22	G. Miller	0.80	616.00	B120	Call with T. Moyron, C. Montgomery, S. Maizel and D. Cook re issues concerning Fannie Mae settlement.

First Guaranty Mortgage Corporation  
Matter: 15810756-000003  
Invoice No.: 2581314

November 30, 2022

Date	Timekeeper	Hours	Amount	Task	Narrative
09/01/22	G. Miller	1.70	1,309.00	B120	Revise and finalize motion to approve Fannie Mae settlement, supporting declaration and related exhibits.
09/08/22	G. Miller	0.60	462.00	B120	Attend hearing re approval of Fannie Mae settlement.
09/27/22	C. Montgomery	0.80	968.00	B120	Communications with A. Samples and T. Meerovich regarding scheduled asset recovery meeting and prepare for same (.3); participate in meeting with Strathmor regarding bid procedures (.5).
09/28/22	C. Montgomery	0.20	242.00	B120	Review committee objection to bid procedures (.1); communications with M. Schwarzmman, A. Samples regarding Customers loan liquidations (.1).
	Subtotal	4.40	3,828.00		

B130 - Asset Disposition

Date	Timekeeper	Hours	Amount	Task	Narrative
09/04/22	G. Miller	0.60	462.00	B130	Call with T.Moyron, S.Maizel, L.Davis Jones, T.Cairns re sale and solicitation procedures.
09/04/22	S. Maizel	1.30	1,261.00	B130	Zoom conference with L. Jones, T. Cairns, T. Moyron, etc. re motion to sell assets (.6); telephone conference with T. Moyron re assets to be sold (.4); review and respond to emails re assets to be sold (.3).
09/04/22	T. Moyron	1.00	790.00	B130	Zoom conference with L. Jones, T. Cairns, T. Moyron, etc. re motion to sell assets (.6); telephone conference with S. Maizel re assets to be sold (.4).
09/05/22	T. Moyron	1.30	1,027.00	B130	Correspond with T. Cairns, et al, regarding sales procedures motion, motions to shorten, and related documents.
09/05/22	T. Moyron	1.70	1,343.00	B130	Analyze sale procedures motion, bid procedures and order.
09/06/22	S. Maizel	0.50	485.00	B130	Review and revise motions to shorten time on solicitation and sale procedures motions.
09/06/22	G. Miller	0.40	308.00	B130	Review motion to approve bidding procedures.

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09/06/22	T. Moyron	1.30	1,027.00	B130	Correspond with T. Cairns, D. Cook, et al., re bid procedures sale motion and call with E. Howe et al. re same (.7); analyze bid procedures motion and other documents (.6).
09/06/22	T. Moyron	0.40	316.00	B130	Analyze and provide comments to motion to shorten and correspond with T. Cairns regarding same.
09/07/22	S. Maizel	1.00	970.00	B130	Zoom conference with A. Samples, D. Oien, etc. re retention of Investment Banker re sale of remaining assets.
09/07/22	E. Oliver	0.20	131.00	B130	Call with C. O'Leary regarding Holdback/Setoff Analysis of MLPA/MSR Sale Agreements.
09/07/22	T. Moyron	0.10	79.00	B130	Analyze email from D. Oien re FirstLine Title.
09/07/22	T. Moyron	0.30	237.00	B130	Analyze list of counterparties to various agreements re Class 4 (.1); correspond with D. Cook, et al., re same (.2).
09/08/22	T. Moyron	0.50	395.00	B130	Analyze email from A. Samples, D. Oien re BSI (.2) and related matters (.3).
09/08/22	E. Oliver	2.00	1,310.00	B130	Reviewed MLPAs/MSR Sale Agreements for holdback/setoff provisions (.5); drafted analysis (1.0); correspondence and call with FTI (.5).
09/08/22	L. Harrison	1.00	1,140.00	B130	Review latest developments from docket in preparation for hearing regarding Fannie Mae settlements and related matters (.40); attend hearing regarding Fannie Mae settlements and timetable for plan and disclosure statement (.60).
09/08/22	C. Montgomery	0.60	726.00	B130	Review BSI price change request and explanation detail (.5); communications with T. Moyron re same (.1).
09/09/22	E. Oliver	0.70	458.50	B130	Call with FGMC and CO regarding holdback/setoff analysis.
09/11/22	S. Maizel	0.50	485.00	B130	Zoom conference with C. O'Leary, etc. re sale of MLRSA.

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Date	Timekeeper	Hours	Amount	Task	Narrative
09/12/22	E. Oliver	6.50	4,257.50	B130	Reviewed MLPA/MSR Sale Agreements for Holdback/Setoff provisions. Drafted analysis. Call and correspondence with C. O'Leary.
09/13/22	E. Oliver	1.40	917.00	B130	Revised Holdback/Setoff analysis (.7); discussion with CO regarding Holdback/Setoff analysis (.7).
09/13/22	S. Maizel	0.60	582.00	B130	Zoom conference with Stratmor, FTI, A. Samples, re sale process issues.
09/13/22	S. Maizel	1.00	970.00	B130	Zoom conference with M. Schwarzmann, etc. re asset sales.
09/13/22	S. Schrag	0.40	260.00	B130	Confer with J. John, D. Oien, T. Moyron, and C. Montgomery regarding meeting with TIAA.
09/13/22	T. Moyron	1.40	1,106.00	B130	Correspondence with C. Montgomery, et al re MassMutual and TIAA (.2); correspondence with T. Meerovich, et al., re priority items (.2); correspondence with T. Meerovich, et al., regarding Optimal Blue, and other financial and case matters (1.0).
09/14/22	S. Maizel	0.60	582.00	B130	Telephone conference with Stratmor, etc. re sale of remaining assets (.5); email to T. Moyron re same (.1).
09/14/22	E. Oliver	1.30	851.50	B130	Prepared for and had call with FGMC regarding Holdback/Setoff Rights (.6); correspondence with C. O'Leary (.7).
09/15/22	T. Moyron	0.70	553.00	B130	Call with Stratmor, T. Meerovich, A. Samples, et al., re sales process.
09/15/22	S. Maizel	0.40	388.00	B130	Zoom conference with A. Samples, First Title, etc. re joint venture disposition.
09/15/22	S. Maizel	0.70	679.00	B130	Zoom conference with Stratmor re sale of remaining assets.
09/15/22	E. Smith	0.40	410.00	B130	Reviewed and prepared correspondence regarding instructions to subservicer to segregate and remit collections on loans funded by repo buyer to repo buyer or its designee.
09/19/22	T. Moyron	0.40	316.00	B130	Call with Stratmor, T. Meerovich, A. Samples, et al. re sale process.

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Date	Timekeeper	Hours	Amount	Task	Narrative
09/19/22	T. Moyron	0.70	553.00	B130	Call with Buckley, E. Howe, et al. re licensing matters.
09/19/22	D. Cook	0.10	62.00	B130	Email correspondence with T. Moyron regarding bid procedures objection deadline.
09/19/22	S. Maizel	0.50	485.00	B130	Zoom conference with Stratmor, A. Samples, etc. re sale issues.
09/20/22	T. Moyron	0.30	237.00	B130	Call with M. Garms regarding preparation of template LOI and sale process.
09/20/22	T. Moyron	0.30	237.00	B130	Call with A. Samples, T. Meerovich, and representatives from TIAA re remittances.
09/20/22	T. Moyron	0.20	158.00	B130	Analyze D. Solomon, T. Meerovich, et al., emails regarding LOI.
09/20/22	T. Moyron	0.10	79.00	B130	Analyze emails from N. Peterman, L. Manning re teaser.
09/20/22	T. Moyron	0.40	316.00	B130	Analyze teaser and attention to LOI and sale matters.
09/20/22	T. Moyron	0.10	79.00	B130	Correspond with L. Lerman re list of assets.
09/20/22	G. Medina	0.40	144.00	B130	Review request from T. Moyron regarding sale motion and related pleadings (0.1); retrieve and send sale motion and related documents to T. Moyron, S. Maizel and M. Garms (0.3).
09/21/22	G. Medina	0.10	36.00	B130	Send, per the request of T. Moyron, the Sale Motion filed.
09/21/22	E. Smith	0.40	410.00	B130	Review drafts of loan sale LOIs.
09/21/22	S. Maizel	0.80	776.00	B130	Zoom call with A. Samples, etc. re Stratmor issues.
09/21/22	T. Moyron	0.40	316.00	B130	Conference call with C. Montgomery re LOI terms and venue (.1); correspond with A. Samples, et al., re LOI (.3).
09/21/22	T. Moyron	0.20	158.00	B130	Analyze draft LOI template (.1), and correspond with M. Garms re same (.1).
09/22/22	T. Moyron	0.20	158.00	B130	Conference call with T. Cairns regarding pending issues, including DS and plan and WARN matters.
09/22/22	T. Moyron	0.20	158.00	B130	Analyze emails from D. Oien, et al., re Balbec sale.

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Date	Timekeeper	Hours	Amount	Task	Narrative
09/22/22	T. Moyron	0.20	158.00	B130	Correspond with A. Samples re Click n. Close LOI (.1); prepare emails to L. Smith, et al., and review follow up emails (.1).
09/22/22	L. Macksoud	0.30	231.00	B130	Review emails from Flagstar re loan proceeds (.1) and confer with FTI re same (.2).
09/22/22	T. Moyron	0.20	158.00	B130	Conference call with S. Maizel and M. Power re information request, extension of deadline, and other matters.
09/22/22	E. Smith	1.60	1,640.00	B130	Reviewed and commented on draft mortgage loan sale agreement between FGMC and purchaser of non QM loans, and reviewed related LOI (1.3); reviewed new LOI for purchase and sale of GNMA eligible loans (.3).
09/22/22	C. Montgomery	0.10	121.00	B130	Communications with T. Moyron and A. Samples regarding Seneca Mortgage Servicing inquiry to M. Caloway (.1).
09/23/22	T. Moyron	1.30	1,027.00	B130	Participate in Stratmor reoccurring call with T. Meerovich, A. Samples, et al., re sale matters.
09/23/22	L. Macksoud	1.80	1,386.00	B130	Confer with FTI and counsel for Flagstar re status of segregated account (.2); review comments to Plan and disclosure statement provided by Flagstar (.4); and research issues related to measurement of adequate protection/diminution of value (1.0); draft summary of same for C. Montgomery (.2).
09/23/22	S. Maizel	1.30	1,261.00	B130	Zoom conference with Stratmor, etc. re sale of assets.
09/26/22	T. Moyron	0.20	158.00	B130	Call with Stratmor, T. Meerovich, A. Samples re sample process.
09/27/22	T. Moyron	0.90	711.00	B130	Call with T. Cairns re upcoming call with Stramor regarding sale process (.1); conference call with Stratmor, T. Cairns, L. Manning, et al., regarding sale process and bidding procedures (.4); analyze email from M. Caloway re bidding procedures to resolve UST issues (.1); analyze revised bidding procedures and redline (.3).
09/28/22	S. Maizel	0.30	291.00	B130	Zoom conference with Stratmore, A. Samples, etc. re sale of assets.

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Date	Timekeeper	Hours	Amount	Task	Narrative
09/29/22	E. Smith	0.30	307.50	B130	Reviewed correspondence relating to subservicer instructions to segregate and remit mortgage loan collections for the benefit of specified warehouse liquidity providers.
09/30/22	E. Smith	0.30	307.50	B130	Prepared loan remittance release confirmation with counsel for subservicer.
	Subtotal	45.40	36,941.50		

B140 - Relief from Stay/Adequate Protection Proceedings

Date	Timekeeper	Hours	Amount	Task	Narrative
09/14/22	S. Schrag	0.30	195.00	B140	Confer with FGMC counsel N. Burkett regarding potential sheriff's sale of property subject to FGMC first lien.
09/29/22	K.M. Howard	2.60	884.00	B140	Review email from S. Schrag regarding new state court case in Bell County Texas (.1); prepare response thereto (.1); review docket (.1); pull complaint and review (.3); prepare Notice of Bankruptcy and Automatic Stay (.4); prepare exhibits thereto (.2); review and finalize Notice of Bankruptcy and Automatic Stay (.2); prepare email to S. Schrag regarding status of underlying case and Notice of Bankruptcy (.2); email exchange with S. Schrag regarding Notice of Stay for 146th Judicial District (.1); review email from S. Schrag regarding C. Doherty's credentials (.1); prepare response thereto (.1); email exchanges with C. Doherty regarding Notice of Bankruptcy and Automatic Stay (.1); review and revise Notice of Bankruptcy and Automatic Stay re Giganti (.3); finalize revised Notice of Bankruptcy and Automatic and prepare exhibits thereto (.2); prepare email to T. Chauhan regarding same (.1).
09/29/22	S. Schrag	0.50	325.00	B140	Review correspondence regarding notice of bankruptcy (.1); confer with K. Howard regarding the same (.1); review notice (.1); confer with T. Moyron, K. Howard, and S. Maizel regarding the same (.1); confer with C. Doherty regarding the same (.1).
	Subtotal	3.40	1,404.00		

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B150 - Meetings of and Communications with Creditors

Date	Timekeeper	Hours	Amount	Task	Narrative
09/01/22	C. Montgomery	0.10	121.00	B150	Communications with R. Heidenreich and T. Moyron regarding Committee discovery requests.
09/01/22	C. Montgomery	0.30	363.00	B150	Communications with M. Power and M. Indelicato regarding UCC searches.
09/02/22	T. Moyron	0.20	158.00	B150	Correspond with T. Meerovich, et al., re Committee discovery.
09/09/22	T. Moyron	0.20	158.00	B150	Analyze email from M. Power re Committee information requests.
09/09/22	C. Montgomery	1.50	1,815.00	B150	Communications with M. INdelicato regarding Committee information request (1.5).
09/14/22	C. Montgomery	0.70	847.00	B150	Communications with T. Moyron regarding committee information demands and responses.
09/15/22	C. Montgomery	0.10	121.00	B150	Communications with T. Moyron regarding committee information requests.
09/16/22	S. Alberts	0.10	99.00	B150	Receive call from creditor and forward to S. Schrag to respond.
09/20/22	T. Moyron	0.10	79.00	B150	Prepare email to M. Power, et al., re coordination of call and review responses from M. Indelicato, et al.
09/20/22	C. Montgomery	0.20	242.00	B150	Phone call with T. Moyron re scheduling committee call timing (.1); review draft presentation deck from L. Manning for Committee Use (.1).
09/21/22	C. Montgomery	1.00	1,210.00	B150	Participate in Zoom meeting with Committee advisors include M. Power and M. Indelicanti.
09/22/22	T. Moyron	1.20	948.00	B150	Conference call with Committee legal advisors, including M. Power, S. Maizel, and C. Montgomery re requests for information, analyzed claims, and timing related to DS and plan.
09/22/22	C. Montgomery	0.70	847.00	B150	Participate in zoom call with Committee Counsel including M. Power, M. Indelicato, S. Maizel and T. Moyron.

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Date	Timekeeper	Hours	Amount	Task	Narrative
09/23/22	C. Montgomery	0.10	121.00	B150	Communications with C. O'Leary regarding Committee information requests.
09/23/22	T. Moyron	0.70	553.00	B150	Analyze updated excel chart regarding responses re Committee requests (.3); conference call with D. Oien re same (.1); correspond with L. Manning re same (.1); prepare email to M. Power regarding responses (.2).
09/23/22	T. Moyron	0.30	237.00	B150	Correspond with A. Samples, T. Meerovich, and D. Oien re Committee information and document requests.
09/24/22	C. Montgomery	1.20	1,452.00	B150	Attend joint meeting of Committee Professionals, DIP Lender Professionals and Debtor professionals regarding possible global resolution issues (.4); Rule 408 communications with Committee counsel regarding diligence inquiries (.1); zoom call with committee counsel and financial advisers including M. Power, M. Indelicato, J. Vizzini, T. Meerovich, S. Maizel, T. Moyron (.7).
09/25/22	C. Montgomery	1.20	1,452.00	B150	Phone call with L. Whidden regarding committee investigation issues background (.2); participate in conference call with Committee advisors (.7); phone call with L. Whidden regarding same (.3).
09/25/22	T. Moyron	0.80	632.00	B150	Conference call with Committee advisors, including M. Power and D. Galfus, A. Samples, D. Oien, et al., regarding Committee questions and diligence.
09/27/22	C. Montgomery	0.20	242.00	B150	Review Committee Settlement term sheet and communications with T. Moyron re same.

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Date	Timekeeper	Hours	Amount	Task	Narrative
09/28/22	C. Montgomery	4.30	5,203.00	B150	Participate in settlement conference with M. Power, T. Moyron and L. Jones regarding committee settlement opportunities (1.0); participate in settlement conference with E. Howe, M. Power and T. Moyron re committee settlement issues (1.2); participate in Zoom call with E. Howe, M. Power, J. Vizzini, T. Meerovich, T. Moyron regarding wind down diligence for Settlement (.8); in Person conversation R. Howe, M. Power, T. Moyron Re Cash Flow DIP lender Response (.5); confer with E. Howe regarding Customer impact on Proposed Committee settlement (.3); continued conversation with M. Power, T. Moyron and L Jones re proposed settlement (.5).
09/28/22	T. Moyron	4.00	3,160.00	B150	Participate in settlement conference in Delaware with M. Power, L. Jones and C. Montgomery re potential settlement (1.0); participate in settlement conference with E. Howe, M. Power, and C. Montgomery (1.2); participate in Zoom meeting with E. Howe, M. Power, FTI, BRG, et al. re wind-down (.8); follow up meeting with E. Howe, M. Power, et al. (.5); further meetings with M. Power, L. Jones and C. Montgomery (.5).
Subtotal		19.20	20,060.00		

B160 - Fee/Employment Applications

Date	Timekeeper	Hours	Amount	Task	Narrative
09/01/22	T. Moyron	0.10	79.00	B160	Prepare email to L. Jones re BRG retention application.
09/01/22	T. Moyron	0.10	79.00	B160	Analyze email from T. Ofak re Declaration re OCP.
09/01/22	S. Maizel	0.40	388.00	B160	Review and respond to emails re preparation of first monthly fee application.

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Date	Timekeeper	Hours	Amount	Task	Narrative
09/01/22	G. Medina	2.70	972.00	B160	Correspond with S. Maizel regarding preparation of first monthly fee application (0.1); correspond and call with J. Moe regarding first monthly application (0.2); review first monthly invoice received by S. Maizel (0.4); correspond with T. Gray regarding information omitted from invoice (0.1); correspond with C. Aria and R. Johnson regarding information needed for the preparation of first monthly draft (0.3); received and review information requested (0.2); draft first monthly fee application (1.4).
09/01/22	J.A. Moe, II	0.50	380.00	B160	Exchange E-Mails with Sam Maizel on preparing the First Monthly Fee Application (.10); preliminarily review the time incurred and descriptions of services provided by Dentons (.20); retrieve form and contents of a Monthly Fee Application (.10); telephone call from George Medina on form and contents of, and Charts to be included or appended to, a Fee Application (.10).
09/02/22	G. Medina	4.90	1,764.00	B160	Analyze claim agent's website regarding notice parties (0.2); review compensation order regarding notice parties (0.2); send first draft of first monthly to S. Maizel and J. Moe for review (0.2); revised draft of first monthly application to include all notice parties listed on the compensation order (0.4); work on charts accompanying first monthly (2.4); additional edits to the first monthly (0.2); conference call with S. Maizel and J. Moe regarding first monthly and first interim (0.4); correspond with S. Schrag regarding clarifying expense detail (0.1); revised first monthly to include information for attorneys who are admitted pro hac vice in the case and the expense detail for S. Schrag (0.2); review several cases and retrieve per the request of S. Maizel samples of interim fee applications filed by Pachulski (0.3); review and retrieve Dentons retention application along with the order entered approving retention and send to S. Maizel and J. Moe (0.2); send revised monthly first interim to S. Maizel and J. Moe for review and comment (0.1).

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Date	Timekeeper	Hours	Amount	Task	Narrative
09/02/22	S. Maizel	0.50	485.00	B160	Zoom conference with G. Medina and J. Moe re preparation of quarterly fee application.
09/02/22	J.A. Moe, II	0.60	456.00	B160	Additional review of the form of Monthly Fee Applications (.20); additional review of the Charts to be included in or attached to Fee Applications, continuing to review multiple Fee Applications filed in Delaware (.20); telephone call with attorney Sam Maizel and paralegal George Medina on Monthly and Quarterly Fee Applications (.20).
09/06/22	J.A. Moe, II	0.40	304.00	B160	Review draft of Dentons' First Monthly Fee Application (.20); telephone call from George Medina on three suggested minor revisions to the Fee Application (.10); E-Mail to Sam Maizel on necessity to confer and obtain approval to proceed, and the suggested possible minor revisions the Dentons' Fee Application (.10).
09/07/22	G. Medina	0.40	144.00	B160	Work on edits to First Monthly fee application and send to J. Moe and S. Maizel.
09/09/22	S. Maizel	0.50	485.00	B160	Review and revise first monthly fee application.
09/09/22	G. Medina	5.00	1,800.00	B160	Correspond with S. Maizel and J. Moe and send first monthly application (0.1); call with J. Moe regarding first monthly (0.2); correspond with S. Maizel and J. Moe regarding first interim fee statement (0.1); work on new version of first monthly fee application to comply with local rules and guidelines in large and complex cases, including reformatting charts of professionals, categories, expenses the notice of filing first monthly fee application and created categories for services rendered during the first monthly period (4.6).
09/09/22	J.A. Moe, II	0.50	380.00	B160	Review format of Quarterly Fee Application to be filed in Delaware (.30); exchange E-Mails with Sam Maizel on review and completion of the First Monthly Fee Application (.10); exchange E-Mails with George Medina on First Monthly Fee Application (.10).

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Date	Timekeeper	Hours	Amount	Task	Narrative
09/09/22	T. Moyron	0.30	237.00	B160	Analyze email from T. Cairns and attached engagement agreement and application re Stratmor (.2); correspond with T. Cairns re same and related matters (.1).
09/11/22	G. Medina	2.80	1,008.00	B160	Continue to review first monthly statement and work on categories for services rendered during the first monthly period.
09/12/22	T. Moyron	0.30	237.00	B160	Correspond with M. Caloway regarding Stratmor engagement letter and related matters (.2); exchange correspondence with A. Samples regarding engagement agreement (.1).
09/13/22	T. Moyron	0.40	316.00	B160	Conference call with Stratmor, T. Meerovich, A. Samples, S. Maizel, et al., re sales process.
09/13/22	J.A. Moe, II	4.20	3,192.00	B160	Telephone call from George Medina on request for assistance in creating narrative on multiple Categories Of Services performed by Dentons for Dentons' First Monthly Application (.10); commence work on preparation of narratives by reviewing, annotating and highlighting the Docket for the period June 30, 2022 through August 8, 2022 (.80); review and revise invoice for monthly fee application (2.20); prepare rough draft of the descriptions of services for the First Monthly Fee Application (1.10).
09/13/22	G. Medina	1.10	396.00	B160	Review and revise on narratives related to services rendered for the First Monthly Fee period (0.6); call with J. Moe regarding draft of the first monthly (0.3); send to J. Moe to draft other categories related to services rendered for the monthly period (0.2).

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Date	Timekeeper	Hours	Amount	Task	Narrative
09/14/22	J.A. Moe, II	3.20	2,432.00	B160	Telephone call to George Medina on preparation of the descriptions of services for 17 Categories Of Services (.10); review the first draft of the descriptions of services being integrated into the First Monthly Fee Application (.20); review and revise the first draft of 19 descriptions of services for the First Monthly Fee Application (1.20); identify pleadings in connection with Dentons' services in regard to Financing, then prepare new descriptions of services on financing for the Financing Category Of Service (.70); review and revise the second draft of all current descriptions of services in the First Monthly Fee Application (.60); prepare final two descriptions of services on Asset Disposition and on Insurance (.40).
09/14/22	S. Maizel	0.30	291.00	B160	Review and respond to emails re first monthly fee application.
09/15/22	J.A. Moe, II	1.10	836.00	B160	Review descriptions of services on Financing, Insurance and Asset Disposition, then integrate the descriptions into Dentons' First Monthly Fee Application (.20); review the first complete version of the 21 descriptions of services to be included in Dentons's Monthly Fee Application (.40); revise all 21 descriptions of services in Dentons' ' First Monthly Fee Approval (.50).
09/16/22	J.A. Moe, II	0.60	456.00	B160	Revise descriptions of services for Dentons' First Monthly Fee Application.
09/19/22	J.A. Moe, II	1.00	760.00	B160	Review and revise the description of services for Dentons' First Monthly Fee Application (.90); review the revised descriptions of services (.10).
09/19/22	G. Medina	0.60	216.00	B160	Correspond with J. Moe regarding FGMC First monthly (0.1); review draft of First Monthly (0.4); correspond with T. Moyron, S. Maizel and J. Moe regarding timing of draft (0.1).
09/20/22	T. Moyron	0.20	158.00	B160	Attention to fee application matters.
09/21/22	G. Medina	0.50	180.00	B160	Edits to the DUS First Monthly application and send to T. Moyron, S. Maizel and J. Moe (0.4); correspond with T. Moyron regarding Fee application and charts (0.1).

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Date	Timekeeper	Hours	Amount	Task	Narrative
	Subtotal	33.20	18,431.00		

B185 - Assumption/Rejection of Leases and Contracts

Date	Timekeeper	Hours	Amount	Task	Narrative
09/02/22	T. Moyron	0.20	158.00	B185	Analyze emails from BakerHostetler and related issues re Optimal Blue.
09/02/22	S. Schrag	0.50	325.00	B185	Review correspondence from T. Cairns regarding counterparty to rejection motion (.1); confer with counterparty's counsel regarding rejection consequences (.2); confer with J. John regarding the same (.2).
09/03/22	C. Montgomery	0.60	726.00	B185	Zoom call with S. Maizel and T. Moyron regarding Mass Mutual servicing agreement rejection (.6).
09/04/22	S. Schrag	0.20	130.00	B185	Confer with Optimal Blue counsel regarding rejection motion.
09/06/22	C. Montgomery	2.40	2,904.00	B185	Communications with T. Moyron regarding advice note to FTI and A. Samples regarding rejection of servicing agreements.
09/06/22	S. Schrag	2.10	1,365.00	B185	Conference with counsel for Optimal Blue contracts (.5); confer with C. Reeves regarding the same (.2); confer with Optimal Blue counsel regarding follow-up (.6); confer with T. Moyron, S. Maizel, and T. Cairns regarding follow-up (.5); conduct research regarding the same (.3).
09/07/22	S. Schrag	0.40	260.00	B185	Participate in weekly reoccurring call with S. Maizel, J. John and D. Oien, discussing rejection motion and outstanding issues, as well as employee wage payments.
09/07/22	C. Montgomery	1.90	2,299.00	B185	Continued drafting of advice note to FTI and A. Samples regarding rejection of servicing agreements (1.9).
09/07/22	T. Moyron	0.20	158.00	B185	Analyze emails from M. Delaney, et al., re Optimal Blue Contracts.

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Invoice No.: 2581314

November 30, 2022

Date	Timekeeper	Hours	Amount	Task	Narrative
09/08/22	S. Schrag	1.10	715.00	B185	Review docket for objections to rejection motion (.1); confer with M. Delaney regarding reservation and potential settlement (.3); confer with T. Cairns and T. Moyron regarding the same (.7).
09/09/22	S. Schrag	0.70	455.00	B185	Review correspondence from M. Delany regarding rejection motion and proposed order (.1); confer with J. John regarding the same (.2); confer with T. Moyron, S. Maizel, and T. Cairns regarding the same (.2); confer with T. Cairns regarding the same (.1); confer with M. Delaney regarding the same (.1).
09/09/22	C. Montgomery	2.50	3,025.00	B185	Draft client communication note for TIAA for review by T. Moyron and Client (1.0); review S. Smith report on capitalized modification balances and compare to Mass Mutual SWSA (1.3); phone call with N. Sombuntham re same (.2).
09/10/22	C. Montgomery	0.20	242.00	B185	Continued work on Mass Mutual advance recovery project (.2).
09/11/22	S. Schrag	0.60	390.00	B185	Review Optimal Blue response to rejection motion (.3); review correspondence from M. Caloway regarding the same (.1); confer with T. Cairns regarding underlying contractual terms (.1); confer with J. John regarding the same (.1).
09/11/22	C. Montgomery	0.50	605.00	B185	Zoom call with S. Maizel and T. Moyron regarding Mass Mutual MLPA servicing dispute.
09/12/22	S. Schrag	1.90	1,235.00	B185	Confer with M. Caloway and T. Cairns regarding rejection order and hearing (.2); review Optimal Blue statement in response to rejection motion (.6); confer with J. John regarding the same (.2); review underlying contracts (.9).
09/12/22	S. Schrag	0.20	130.00	B185	Recurring call with J. John to discuss rejection motion and upcoming hearing, among other things.

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09/13/22	S. Schrag	3.10	2,015.00	B185	Confer with M. Delaney regarding order (.6); confer with T. Moyron regarding the same (.1); confer with T. Moyron and T. Cairns regarding the same (.3); correspond with M. Delaney regarding the same (.8); revise schedule to incorporate comments from Optimal Blue counsel (.7); prepare for hearing (.4); confer with T. Cairns regarding the same (.2).
09/13/22	C. Montgomery	0.10	121.00	B185	Communications with T. Moyron regarding counter-party holdback settlements (.1).
09/14/22	C. Montgomery	4.60	5,566.00	B185	Draft notice letters for Mass Mutual and TIAA (2.9); communications with T. Meerovich and T. Moyron regarding Blocked Account release. (.3); phone call with S. Maizel regarding same (.1); further drafting updates to TIAA letter and Mass Mutual letter and communications with T. Meerovich and A. Samples regarding same (1.3).
09/14/22	S. Schrag	1.40	910.00	B185	Review correspondence regarding rejection motion hearing (.2); prepare for the same (.4); participate in hearing on rejection motion (.6); review correspondence regarding court order on the same (.2).
09/15/22	T. Moyron	0.20	158.00	B185	Analyze transcript from hearing re Optimal Blue.
09/15/22	C. Montgomery	2.10	2,541.00	B185	Prepare for and participate in TIAA call with A. Samples, T. Meerovich and others (.9); communications with T. Meerovich regarding Flagstar funds (1.0); communications with C. O'Leary and T. Moyron regarding Deutsche Bank custodial funds (.1); phone call with T. Moyron regarding waiver discussion with Greenberg (.1).
09/16/22	C. Montgomery	0.30	363.00	B185	Communications with T. Meerovich regarding TIAA assumption or rejection issues.

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Date	Timekeeper	Hours	Amount	Task	Narrative
09/20/22	C. Montgomery	1.40	1,694.00	B185	Participate in zoom call with Mass Mutual regarding servicing agreements (.5); follow up communications with J. Johnson, A. Samples and T. Moyron (.4); participate in zoom call with Planet Home Mortgages regarding MSR sale agreements and hold back creditor status (.5).
09/22/22	C. Montgomery	0.10	121.00	B185	Communications with counsel for TIAA.
09/23/22	T. Moyron	0.10	79.00	B185	Analyze email from D. Oien re MERS.
09/26/22	L. Harrison	0.90	1,026.00	B185	Review recent opinion addressing admin claims and servicing agreements (.70); circulate same to internal FGMC team (.20).
09/26/22	C. Montgomery	0.70	847.00	B185	Review DiTech breach of servicing agreement and communications with L. Harrison regarding same.
09/30/22	C. Montgomery	0.80	968.00	B185	Teams call regarding Barings Mass Mutual servicing agreement (.5); review TIAA motion to compel assumption or rejection (.3).
Subtotal		32.00	31,531.00		

B190 - Other Contested Matters (excl. assumption/rejection motions)

Date	Timekeeper	Hours	Amount	Task	Narrative
09/01/22	T. Moyron	0.30	237.00	B190	Zoom conference with GT attorneys re UCC discovery.
09/01/22	T. Moyron	0.70	553.00	B190	Correspond with GT counsel re Committee discovery (.2) and analyze related matters (.3); analyze emails from C. Montgomery, et al., re UCC searches (.2).

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Date	Timekeeper	Hours	Amount	Task	Narrative
09/01/22	D. Cook	3.80	2,356.00	B190	Revise motion to approve stipulation (1.9); Analyze T. Moyron email communication pertaining to FNMA settlement (.2); analyze FNMA revised motion to approve stipulation with respect to same (.2); analyze FNMA revised stipulation with respect to same (.1); zoom conference with Dentons team regarding filing of FNMA settlement materials (.8); email communications with G. Miller and M. Caloway regarding filing of same (.3); email communications with Dentons team regarding status of same (.2); email communications with client regarding same (.1).
09/06/22	C. Doherty, Jr.	2.40	1,668.00	B190	Prepare memorandum regarding automatic stay and employment lawsuits filed.
09/07/22	D. Cook	0.30	186.00	B190	Analyze set off rights issue for call with T. Moyron call pertaining to same.
09/07/22	S. Alberts	0.60	594.00	B190	Receive and review service of summons in WARN action (.1), follow up response to client (.1) and communicate internally about litigation and defenses thereto (.4).
09/08/22	D. Cook	0.20	124.00	B190	Email communications with S. Maizel, T. Moyron, and G. Medina regarding Fannie/Freddie settlement materials ahead of hearing.
09/12/22	S. Alberts	0.90	891.00	B190	Send communication concerning status of WARN litigation (.1), receive response from T. Moyron and reply (.1), communicate with R. Heidenreich by email (.1) and by phone (.5), follow up with T. Moyron for wider call concerning litigation (.1).
09/12/22	T. Moyron	0.30	237.00	B190	Analyze correspondence from M. Power regarding document requests and meet and confer (.2); prepare emails to T. Meerovich, et al., re same (.1).
09/13/22	S. Alberts	1.30	1,287.00	B190	Communications with working group about WARN meeting and set up call (.1) and call with S. Maizel, T. Moyron and R. Heidenreich (.8), email to FTI seeking WARN information (.1) and conference with C. Doherty about estimation proceeding (.3).

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Date	Timekeeper	Hours	Amount	Task	Narrative
09/13/22	G. Medina	0.70	252.00	B190	Review per the request from T. Moyron and send Orders approving settlement and stipulation with Federal National Mortgage Association (0.4); received addition request and send Debtors Motion Approving settlement motion with Federal National Mortgage Association (0.3).
09/14/22	G. Medina	1.00	360.00	B190	Call with T. Moyron, S. Maizel, D. Cook, FTI Consulting team, D. Oien and A. Samples regarding Outstanding Committee Information requests (0.6); reviewed correspondence received and spreadsheet of UCC Diligence related to responses to requests (0.4).
09/14/22	T. Moyron	1.20	948.00	B190	Analyze excel from FTI re Committee requests (.3); further analyze M. Power requests for information and documents (.2); review responses on various requests (.3); prepare correspondence to M. Power re document requests (.4).
09/14/22	D. Cook	0.20	124.00	B190	Analyze UCC diligence list compiled by FTI in connection with UCC information requests.
09/19/22	S. Alberts	0.30	297.00	B190	Review use of estimation proceeding related to pending litigation and follow up.
09/20/22	S. Alberts	3.50	3,465.00	B190	Review cases on estimation (2.1) and assess strategy for dealing with WARN claims (.3); conference with C. Doherty about estimation issues (.2), communicate with FTI about status of WARN claim analysis (.1), receive and review analysis (.2), WARN Act discussion with T. Moyron, L. Davis Jones and C. Doherty (.6).
09/21/22	S. Alberts	2.10	2,079.00	B190	Communicate internally about WARN claim meeting timing and issues (.1); receive and respond to T. Moyron request for information (.2); conference with C. Doherty about WARN suits and issues (.3); review and draft response to FTI's WARN analysis (.3); and follow up with FTI (.1); conference with FTI and working group about WARN claim issues (.8); follow up with S. McCandless concerning commission issue (.2); communication from T. Moyron about plaintiff's communication (.1).

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Date	Timekeeper	Hours	Amount	Task	Narrative
09/22/22	T. Moyron	0.20	158.00	B190	Analyze email from M. Power re Committee request.
09/22/22	S. Alberts	1.70	1,683.00	B190	Draft and send response to client about CA DOL litigation claim and stay issue (.4); receive, review and assess communication about WARN litigation (.2) and provide response (.3) and follow up communications (.2), receive assessment of wages under WARN and review and consider (.1), conference with working group about WARN litigation (.5).
09/23/22	T. Moyron	0.30	237.00	B190	Analyze further emails from A. Samples, et al., re Committee requests.
09/26/22	T. Moyron	0.50	395.00	B190	Call with N. Peterman, D. Oien, et al., re FCA.
09/26/22	S. Alberts	0.50	495.00	B190	Review Complaint and answer (.4) and respond to R. Heidenreich (.1).
09/26/22	S. Maizel	0.50	485.00	B190	Zoom conference with GT, D. Oien, etc. FCA claims.
09/27/22	S. Alberts	1.80	1,782.00	B190	Receive and review proposed WARN production (.2) and respond with recommendation (.1); review draft answer and consider certain issues and draft proposed language (.4); reach out to M. Harris by email (.1); and call with M. Harris about Answer and certain issues and modifications (.3); receive and review revised draft Answer (.2) and draft additional affirmative responses (.4); and send back to M. Harris (.1).

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Date	Timekeeper	Hours	Amount	Task	Narrative
09/27/22	S. Alberts	2.30	2,277.00	B190	Communicate with S. Maizel and T. Moyron about WARN claim description in Plan and DS (.1); arrange call with T. Moyron, S. Maizel and L. Davis Jones about WARN issues (.1), and conduct call (.4); revise Plan and DS language (.5) and circulate (.1), communicate internally about sending WARN language to DIP lender and then Buckley Plaintiff's counsel (.1), send to N. Peterman with comments (.1), receive authority with request for one minor clarification from Lender Counsel (.1), made clarification (.1), send to Buckley Counsel (.1), communicate with Buckley counsel by email (.1) and follow up call (.3) and communicate internally about call with Buckley (.1) and about plan status (.1).
09/27/22	G. Medina	0.60	216.00	B190	Correspond with T. Moyron and review agenda for Hearing (0.1); retrieve all objections to sale and combined disclosure statement and plan and send to T. Moyron (0.5).
09/28/22	G. Medina	0.40	144.00	B190	Send to clients per the request of T. Moyron Objections to Sale and Combined disclosure statement by Zip file.
09/28/22	S. Alberts	0.70	693.00	B190	Review revised answer and complaint and provide comments to answer (.4) and follow up (.1), communicate about status of settlement discussions and whether authority exists to begin estimation (.1) and receive response thereto (.1).
09/29/22	S. Alberts	0.60	594.00	B190	Receive and review revised Answer in light of comments (.2), provide further revisions to Answer (.4).

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Date	Timekeeper	Hours	Amount	Task	Narrative
09/30/22	S. Alberts	1.70	1,683.00	B190	Email to S. Maizel and T. Moyron about status of settlement discussions with WARN plaintiffs (.1), receive and respond to M. Harriss inquiry regarding WARN answer (.1), receive and respond to inquiry from T. Moyron about Hoover decision (.1), review Hoover decision and assess potential changes to answer to WARN answer and (.5) and provide specific additional recommendations (.3) receive and review follow up from M. Harriss (.1) and draft reply with specific changes to answer (.3), respond to inquiry on filing mechanics (.1) and follow up (.1).
09/30/22	C. Doherty, Jr.	0.10	69.50	B190	Review emails from Texas court regarding filing of notice of automatic stay.
	Subtotal	31.70	26,569.50		

B195 - Non-Working Travel

Date	Timekeeper	Hours	Amount	Task	Narrative
09/27/22	C. Montgomery	0.00	0.00	B195	Travel Hyannis to Providence for Interim Disclosure Hearing.
09/27/22	T. Moyron	0.00	0.00	B195	Travel to Delaware for hearing.
09/29/22	T. Moyron	0.00	0.00	B195	Travel from Delaware to Los Angeles after settlement meetings and hearing re DS and plan.
	Subtotal	0.00	0.00		

B210 - Business Operations

Date	Timekeeper	Hours	Amount	Task	Narrative
09/10/22	S. Schrag	0.70	455.00	B210	Review correspondence from M. Hyland regarding Ordinary Course Professionals (.1); conduct research regarding the same (.3); confer with M. Hyland and T. Moyron regarding findings (.3).
	Subtotal	0.70	455.00		

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B220 - Employee Benefits/Pension

Date	Timekeeper	Hours	Amount	Task	Narrative
09/02/22	C. Doherty, Jr.	0.30	208.50	B220	Prepare email regarding filings in third party employment lawsuits, including regarding violation of automatic stay (.2); call with T. Moyron regarding email and automatic stay issues (.1).
09/07/22	C. Doherty, Jr.	3.90	2,710.50	B220	Review filed plan and disclosure statement documents and conduct follow-up research regarding plan provisions and interplay and strategy with employee claims and WARN claims (1.0); provide draft of email memorandum regarding WARN claim legal questions asked by S. Alberts regarding plan and next steps in case (2.7); review Local Rules regarding deadlines and procedure issues in adversary proceeding (.2).
09/08/22	C. Doherty, Jr.	0.90	625.50	B220	Draft memorandum providing legal analysis regarding employee claims and filed plan (.3); attend hearing concerning plan and sale schedule (.6).
09/08/22	S. McCandless	1.60	1,576.00	B220	Review bankruptcy team communications regarding possibility of state WARN Act claims (.40); respond to same (.30); related review of Wolter Nevada complaint (.40); further respond to same (.50).
09/12/22	R. Heidenreich	0.50	465.00	B220	Telephone conference with S. Alberts to discuss various options for responding to Complaint.
09/12/22	S. Alberts	1.00	990.00	B220	Communicate with client, FTI and S. McCandless about November RIF and notices related thereto.
09/13/22	C. Doherty, Jr.	1.80	1,251.00	B220	Prepare wage order for lodging (.4); draft emails providing analysis for WARN notice as requested by J. Peterson (.5); research precedent for estimation strategy regarding WARN claims (.9).
09/13/22	R. Heidenreich	1.10	1,023.00	B220	Develop options and strategies regarding WARN litigation (.5); telephone conferences with T. Moyron, S. Maizel, and S. Alberts regarding various options (.6).

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Date	Timekeeper	Hours	Amount	Task	Narrative
09/14/22	S. Alberts	0.60	594.00	B220	Receive WARN Act response from FTI and reply (.1), review new WARN Act Notice and provide initial comment (.2), in response to inquire, review plan materials provide specific recommended language in notice (.3).
09/14/22	C. Doherty, Jr.	4.00	2,780.00	B220	Prepare memorandum regarding estimation precedent and strategy for WARN claim (3.8); call with S. Alberts regarding estimation strategy and project (.1); analyze emails concerning WARN notice and drafts of same (.1).
09/14/22	J. Peterson	2.00	1,050.00	B220	Discussions with S. McCandless regarding the WARN Act lawsuit and answer.
09/14/22	J. Peterson	2.00	1,050.00	B220	Analyze Plaintiffs' complaint in order to determine what information is needed from the client, and which allegations can be admitted or denied.
09/14/22	S. McCandless	2.20	2,167.00	B220	Telephone call from R. Heidenreich regarding assistance with Answer to Buckley Class Action WARN Complaint and current status of same (.40); further telephone call with R. Heidenreich regarding same (.10); initial instructions to J. Peterson regarding same (.80); provided information for drafting of affirmative defenses to J. Peterson (.90).
09/15/22	J. Peterson	0.60	315.00	B220	Discussion with R. Heidenreich, S. McCandless, and M. Harriss regarding the WARN Act Class Action.
09/15/22	J. Peterson	1.50	787.50	B220	Begin drafting the WARN Act Class Action answer.
09/15/22	S. McCandless	1.20	1,182.00	B220	Conference call with R. McKenzie, J. Peterson, and M. Hariss to discuss approach to answer to Buckley WARN Act class action complaint (.60); review complaint for same (.40); forward related background information following same (.20).
09/15/22	R. Heidenreich	1.30	1,209.00	B220	Develop plan for preparation of WARN Act class action answer to complaint and supporting calls; telephone conferences and emails with litigation team.

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Date	Timekeeper	Hours	Amount	Task	Narrative
09/18/22	J. Peterson	1.50	787.50	B220	Continue drafting Defendant's answer to Plaintiffs' class action complaint.
09/19/22	R. Heidenreich	0.50	465.00	B220	Direct litigation team on answer to WARN Act class action complaint.
09/19/22	S. McCandless	2.50	2,462.50	B220	Review and analyze Buckley class action Complaint for Answer to same and to determine information needed from client for defense of case(.90); prepare and forward detailed email to J. John regarding employment and WARN-related information for response to Complaint (.80); review J. John's response (.30); prepare and forward additional questions to J. John (.30); review responses (.20).
09/19/22	S. McCandless	1.60	1,576.00	B220	Review J. Peterson's first draft of Answer to WARN Class Action Complaint (.70); telephone call to provide instructions for additional affirmative defenses (.90).
09/19/22	J. Peterson	1.70	892.50	B220	Revise the WARN Act answer to ensure all allegations are responded to and all relevant affirmative defenses are included.
09/19/22	J. Peterson	0.90	472.50	B220	Discussions with S. McCandless regarding the WARN Act answer.
09/19/22	C. Doherty, Jr.	0.70	486.50	B220	Draft analysis of legal strategies for WARN claims and plan.
09/20/22	C. Doherty, Jr.	1.00	695.00	B220	Attend call with L. Jones, T. Moyron, S. Maizel and S. Alberts regarding WARN claims and plan (.6); prepare summary of WARN cases (.2); review and respond to emails regarding strategy for WARN claims and Plan (.2).
09/20/22	S. McCandless	1.00	985.00	B220	Review additional information received from J. Johns for response to WARN class action Complaint (.30); further consider affirmative defenses to WARN class action Complaint (.70).
09/20/22	R. Heidenreich	1.20	1,116.00	B220	Review and comment on draft answer to class action WARN Act complaint.

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Date	Timekeeper	Hours	Amount	Task	Narrative
09/21/22	R. Heidenreich	3.30	3,069.00	B220	Review and comment on several versions of answer to class action WARN Act complaint (1.7); conference with FTII and others regarding WARN Act liability, estimation of potential liability, various emails with team members regarding status and draft answer (1.6).
09/21/22	S. McCandless	4.20	4,137.00	B220	Review and analyze M. Hariss's draft of Answer to WARN Act to prepare for Dentons team conference call (.70); prepare and forward additional affirmative defenses (.30); research for same (.50); conference call with R. Heidenreich, M. Hariss, and J. Peterson to discuss and revise current draft of Answer (1.40); review and analyze revised version following same (.40); provide further related comments for changes to same (.50); related communications with R. Heidenreich and M. Hariss (.40).
09/21/22	J. Peterson	1.00	525.00	B220	Discussion with R. Heidenreich, M. Hariss, and S. McCandless regarding the WARN Act answer.
09/21/22	J. Peterson	1.00	525.00	B220	Discussions with S. McCandless regarding the WARN Act answer and affirmative defenses.
09/21/22	S. McCandless	1.20	1,182.00	B220	Communicate with S. Alberts regarding calculation of WARN Act damages (.30); review related information provided by K. Doherty (.30); various instructions to J. Peterson to determine relevant authority on whether commissions are included in WARN damages (.60).
09/22/22	C. Doherty, Jr.	1.00	695.00	B220	Prepare written email analysis regarding WARN Claims and Plan strategy and review analysis (.5); prepare comments and edits to claim review regarding WARN claims prepared by S. Ruben and draft cover email regarding claim review (.4); call with S. Ruben regarding WARN claim analysis work product (.1).

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Date	Timekeeper	Hours	Amount	Task	Narrative
09/22/22	S. McCandless	2.70	2,659.50	B220	Review latest version of WARN class action answer to complaint (.50); revise defenses related to maintenance of records on class members and forward to R. Heidenreich and M. Harriss with comments on same (.70); further communicate with J. John regarding additional information needed for answer to complaint (.30); review T. Moyron's comments on answer (.20); communicate with T. Moyron regarding answer to complaint (.20); brief HR file review for answer and defense of WARN class action following receipt of five plaintiffs' HR files (.70); communicate with M. Harriss regarding same (.10).
09/22/22	S. McCandless	1.70	1,674.50	B220	Consider, draft, and revise J. Peterson's write up on WARN Act damages, particularly commissions (1.10); further related research (.60).
09/22/22	R. Heidenreich	2.50	2,325.00	B220	Review and comment on answer to class action WARN Act complaint (.8); emails regarding open items for answer (.7); conference regarding WARN Act liability and response to plaintiffs for information (1.0).
09/23/22	S. McCandless	0.40	394.00	B220	Communicate with M. Harriss regarding review of employee files and related factual informaton for answer to WARN class action complaint.
09/26/22	R. Heidenreich	0.50	465.00	B220	Review and respond to emails regarding status of answer and direction to finalize answer to WARN Act class action complaint.
09/26/22	S. McCandless	1.10	1,083.50	B220	Review list prepared by M. Harriss of additional information needed to finalize Answer to WARN class action complaint (.60); communicate with R. Heidenreich and M. Harriss regarding additional information needed to finalize Answer (.30); further related communicate with bankruptcy team regarding same (.20).
09/26/22	C. Doherty, Jr.	0.20	139.00	B220	Analyze draft of proposed plan language regarding WARN claims and compare to precedent.

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Date	Timekeeper	Hours	Amount	Task	Narrative
09/27/22	C. Doherty, Jr.	0.20	139.00	B220	Review plan and precedent regarding WARN and employee claims.
09/27/22	S. McCandless	0.90	886.50	B220	Communicate with M. Harriss regarding pending factual questions for response to complaint (.50); review S. Alberts' additions to affirmative defenses (.20); communicate with M. Harriss regarding liquidating fiduciary defense (.20).
09/27/22	R. Heidenreich	0.50	465.00	B220	Review remaining steps to finalize answer to WARN Act class action complaint.
09/28/22	C. Doherty, Jr.	0.10	69.50	B220	Instruct S. Ruben regarding WARN claim analysis for filed claims.
09/29/22	C. Doherty, Jr.	0.10	69.50	B220	Instruct S. Ruben regarding WARN claim analysis for filed claims.
09/30/22	S. McCandless	1.90	1,871.50	B220	Review communication from M. Harriss regarding final review of Answer (.10); review latest version of answer (.40); review latest communications from M. Harriss and A. Alberts posing outstanding questions for finalizing same (.20); review and provide employment background information to M. Harriss for outstanding issues (.50); telephone call with M. Harriss to discuss and decide outstanding language to finalize Answer to WARN class action complaint (.70).
09/30/22	C. Doherty, Jr.	0.10	69.50	B220	Review and respond to emails regarding filing of answer in WARN adversary.
	Subtotal	63.70	52,366.50		

B230 - Financing/Cash Collections

Date	Timekeeper	Hours	Amount	Task	Narrative
09/01/22	T. Moyron	0.40	316.00	B230	Analyze email from A. Samples re EBOs (.1); analyze emails from E. Howe and D. Oien re bonds (.1); analyze emails from L. Smith, et al., re Barclays (.2).
09/01/22	T. Moyron	0.70	553.00	B230	Zoom conference with G. Miller, C. Montgomery, et al., re FNMA settlement issues.

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Date	Timekeeper	Hours	Amount	Task	Narrative
09/01/22	T. Moyron	3.90	3,081.00	B230	Correspond with L. Smith re MSFTA and analyze related FTI emails (.2); analyze email from L. Manning re pending issues and agenda (.2); analyze redline and FNMA edits and attend to finalizing motion re FNMA (.7); correspond with M. Caloway re motion to shorten re FNMA (.2); correspond with G. Miller and D. Cook re FNMA motion (.4); correspond with G. Miller and C. Montgomery re FNMA settlement documentation (.3); analyze order and redline re FNMA (.1); prepare email to E. Howe re FNMA term sheet and redline (.1); prepare email to A. Samples re FNMA (.1); prepare email to J. Taylor re FNMA comments (.1); analyze emails from J. Taylor re FNMA (.1); analyze email from A. Samples re MassMutual and TIAA (.1); Zoom call with C. Montgomery, G. Miller, D. Cook and S. Maizel regarding FNMA settlement documentation review (.8); attend Cash Flow DIP Lender Teams call with M. Schwarzman, C. Montgomery, et al. (.5).
09/01/22	C. O'Leary	1.20	1,020.00	B230	Review/analyze comments to Rushmore Letter Agreement and exchange correspondence re: the same (0.4); exchange correspondence re: warehouse facility default interest (0.4); exchange correspondence re: MSFTA Amendment and Limited Waiver (0.4).
09/01/22	E. Smith	1.10	1,127.50	B230	Reviewed final terms of hedging agreement with DIP warehouse provider and prepared and reviewed correspondence with counsel for DIP warehouse provider regarding same (.8); confer with C. Montgomery concerning documentation of pre-petition bridge loan to FMGC (.3).
09/01/22	E. Smith	0.50	512.50	B230	Attended update call with cash flow DIP lender representatives, M. Schwarzmann, FGMC, A. Samples, FTI, W. Nolan, and Dentons team, T. Moyron.

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09/01/22	C. Montgomery	5.30	6,413.00	B230	Communications with G. Miller and T. Moyron regarding FNMA settlement documentation (.3); communications with J. Krasne and T. Moyron, M. Hyland regarding MSFTA annex documentation (.1); Zoom call with T. Moyron, G. Miller, D. Cook and S. Maizel regarding FNMA settlement documentation review (.8); phone call with E.L. Smith regarding Bridge Loan Financing Statement (.2); review default interest issue for repos and Warehouse facilities (3.4); attend Cash Flow DIP Lender Teams call with M. Schwarzman and T. Moyron (.5).
09/02/22	T. Moyron	1.50	1,185.00	B230	Participate in Teams meeting with FTI, including L. Manning, et al., S. Maizel and C. Montgomery re materials and next steps.
09/02/22	D. Cook	0.80	496.00	B230	Dentons team call regarding applicability of default interest with respect to Debtors (.4); follow-up research with respect to same (.4).
09/02/22	C. Montgomery	4.80	5,808.00	B230	Communications with J. Krasne and T. Moyron regarding default interest computations (.1); communications with T. Meerovich, A. Samples and T. Moyron regarding Mass Mutual EBO rejection and advance recoveries (3.7); zoom call with T. Moyron, J. Murphy and D. Cook re default interest computation (.5); communications with D. Cook and T. Moyron regarding default interest case law (.4); review Customers MRA (.1).
09/02/22	S. Maizel	1.50	1,455.00	B230	Zoom conference with FTI, T. Moyron, etc. re budget issues.
09/02/22	C. O'Leary	1.40	1,190.00	B230	Review/analyze comments to Rushmore Letter Agreement and exchange correspondence re: the same (0.4); review/analyze Rushmore PIIT MSR Agreement and exchange correspondence re: the same (.4); exchange correspondence re: counterparty setoff rights (0.6).

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Date	Timekeeper	Hours	Amount	Task	Narrative
09/02/22	T. Moyron	2.60	2,054.00	B230	Correspond with J. Krasne and C. Montgomery regarding default interest computations (.1); analyze correspondence with T. Meerovich, A. Samples and C. Montgomery regarding Mass Mutual EBO rejection and advance recoveries and analyze related issues (1.6); zoom call with C. Montgomery, J. Murphy and D. Cook re default interest computation (.5); correspond with C. Montgomer and D. Cook regarding default interest case law (.4).
09/03/22	T. Moyron	0.70	553.00	B230	Zoom meeting with C. Montgomery, L. Smith, et al. re Mass Mutual and TIAA.
09/06/22	E. Smith	0.70	717.50	B230	Reviewed call agenda (.1); attended update call with representatives of cash flow DIP lender, M. Schwarzmann and N. Pederson, FGMC, A. Samples, FTI, T. Meerovich, and Dentons, T. Moyron (.6).
09/06/22	C. O'Leary	0.90	765.00	B230	Review/analyze Rushmore's comments to letter agreement (0.3); Preparation of Rushmore Letter Agreement and exchange correspondence re: the same (.6).
09/06/22	C. Montgomery	0.30	363.00	B230	Teams meeting with M. Schwarzman, T. Meerovich, T. Moyron (.3).
09/06/22	S. Maizel	1.30	1,261.00	B230	Zoom conference with D. Oien and Glenda Reyes re GNMA notice of violation and response thereto (.6); review and respond to emails re same (.7).
09/06/22	T. Moyron	0.40	316.00	B230	Call with T. Meerovich, M. Schwarzmann, et al. re updates on plan, sale, etc.
09/06/22	T. Moyron	0.30	237.00	B230	Correspond with C. Montgomery and analyze memo re rejection of servicing agreements.
09/07/22	T. Moyron	0.50	395.00	B230	Correspond with C. Montgomery, et al., re MassMutual (.3); analyze email from N. Sombuntham re EBOs (.2).

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Date	Timekeeper	Hours	Amount	Task	Narrative
09/07/22	T. Moyron	0.70	553.00	B230	Analyze emails from A. Samples, et al., regarding NQM trade (.2); analyze emails from C. O'Leary, et al., regarding Rushmore Acknowledgment and Letter Agreement (.2); analyze emails from T. Meerovich, et al., re outstading items to be addressed (.2); analyze C. O'Leary email re MSR purchase agreements required (.1).
09/07/22	T. Moyron	1.10	869.00	B230	Teams meeting with A. Samples, T. Meerovich, D. Oien, et al., re pending matters, including IB retention, EBO, etc.
09/07/22	T. Moyron	0.40	316.00	B230	Call with L. Jones re FNMA settlement hearing and objection from the Committee regarding timeline re plan and sale.
09/07/22	T. Moyron	0.50	395.00	B230	Call with T. Meerovich and S. Maizel regarding budget (.2) and follow up with S. Maizel thereafter (.3).
09/07/22	T. Moyron	0.20	158.00	B230	Analyze email from N. Peterman and call with N. Peterman re upcoming FNMA hearing and Committee objection re deadlines.
09/07/22	C. O'Leary	3.70	3,145.00	B230	Preparation of Rushmore Letter Agreement and exchange correspondence re: the same (1.6); review/analyze MLPAs and MSR PSAs related to setoff rights and exchange correspondence re: the same (1.7); OC Eric Oliver and T. Moyron re: the same (0.4).
09/07/22	C. Montgomery	3.20	3,872.00	B230	Research Customers and repurchase agreement default Interest rate research issues (3.2).
09/08/22	C. Montgomery	0.60	726.00	B230	Attend hearing re approval of Fannie Mae settlement.
09/08/22	C. O'Leary	1.70	1,445.00	B230	Preparation of Rushmore Letter Agreement and exchange correspondence re: the same (1.1); preparation of comments to BSI Interim Servicing Agreement and exchange correspondence re: the same (0.6).
09/08/22	T. Moyron	0.20	158.00	B230	Analyze G. Reyes, et al., emails re June PIIT.
09/08/22	T. Moyron	0.80	632.00	B230	Zoom meeting with T. Meerovich, C. Montgomery, A. Samples, et al. re EBOs.

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09/08/22	J. Milko	0.20	64.00	B230	Prepared fully executed Letter Agreement; office correspondence with C. O'Leary re the matter.
09/08/22	E. Smith	0.50	512.50	B230	Attended update call with cash flow DIP lender representatives, M. Schwarzmann and N. Pederman; FTI, T. Meerovich; FGMC, A. Samples; and Dentons team, T. Moyron.
09/08/22	S. Maizel	1.00	970.00	B230	Prepare for (.4) and participate in hearing on Fannie Mae settlement. (.6).
09/08/22	T. Moyron	0.30	237.00	B230	Conference calls with N. Peterman (.2) and S. Maizel (.1) prior to hearings on FNMA motions and proposed timeline for DS, plan and sale.
09/08/22	T. Moyron	0.70	553.00	B230	Attend Court hearing on FNMA motions and proposed timeline for DS, plan and sale.
09/08/22	C. Montgomery	2.50	3,025.00	B230	Review agenda and Participate in Teams status call with Cash Flow DIP lender including M. Schwartzman, T. Moyron, T. Meerovich (.5); review FTI information on EBO (.1); update EBO memo and prepare for client call (.3); participate in client call with T. Meerovich, A. Samples, D. Oien and others regarding Mass Mutual servicing advance recovery (1.2); continue servicing advance analysis update (.2); communications with L.Smith and B. Clarke regarding milestone extension request documentation (.2).
09/08/22	T. Moyron	1.30	1,027.00	B230	Correspond with B. Clarke re DS and plan (.1); prepare email to B. Hackman re plan (.1); analyze email from T. Cairns (.1); analyze proposed confirmation timeline and related issues (.3); analyze D. Oien, et al., emails re wind down (.2); analyze email from N. Peterman re upcoming call (.1); correspond with C. O'Leary, D. Oien, et al., re set off rights (.2); correspond with M. Power re proposed confirmation deadlines (.2).

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Date	Timekeeper	Hours	Amount	Task	Narrative
09/08/22	T. Moyron	1.30	1,027.00	B230	Analyze emails regarding asset recovery and budget outlook (.3); prepare email to N. Peterman re same (.1); analyze email from C. O'Leary re executed Rushmore letter agreement (.1); analyze J. Gardner email re PITT pools (.1); analyze GNMA tracking chart (.2) and correspond with S. Maizel re same (.1); analyze email from L. Manning re Bravo agenda (.1); analyze emails from M. Hyland, et al., regarding weekly reporting and other financial matters (.3).
09/09/22	C. Montgomery	1.30	1,573.00	B230	Communications with T. Moyron regarding Fannie Mae Settlement documentation (.2); zoom call with S. Warren and T. Moyron regarding settlement documentation process (.4); phone call with E.L. Smith regarding default interest issue (.7).
09/09/22	C. Doherty, Jr.	0.10	69.50	B230	Review filings regarding sale and plan filed in case.
09/09/22	C. O'Leary	2.50	2,125.00	B230	Preparation of comments to BSI Interim Servicing Agreement and exchange correspondence re: the same (0.8); Plan/prepare for/conduct TC FGMC re: MLPA review and set off rights (0.8); review.analyze counterparty MLPAs and PSAs and exchange correspondence re: the same (0.9).
09/09/22	T. Moyron	0.10	79.00	B230	Analyze M. Power, et al., emails re lien searches.
09/09/22	T. Moyron	0.20	158.00	B230	Correspond with T. Meerovich, et al. re materials for Bravo and GT.
09/09/22	T. Moyron	1.30	1,027.00	B230	Correspond with counsel for FNMA re settlement agreement (.2); correspond with A. Samples, et al., re same (.2); analyze email from A. Samples re TIAA (.1); correspond with C. Montgomery re TIAA (.1); prepare email to A. Samples re TIAA (.1); conference call with E. Howe re Customers (.1); analyze email from E. Howe and Customers stipulation (.2); correspond with D. Oien and C. O'Leary regarding MLPAs (.3).

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09/11/22	C. O'Leary	0.60	510.00	B230	Plan/prepare for/conduct telephone conference with T. Moyron, S. Maizel and C. Montgomery re:MLPSA/PSAs and set-off/holdback analysis.
09/11/22	S. Maizel	1.20	1,164.00	B230	Zoom conference with C. Montgomery, etc. re Fannie Mae settlement.
09/11/22	S. Maizel	0.60	582.00	B230	Zoom conference with C. Montgomery, etc. re Customers issues.
09/11/22	C. Montgomery	4.30	5,203.00	B230	Review Fannie Mae definitive documentation (2.5); zoom call with T. Moyron and S. Maizel regarding Fannie Mae documentation issues (1.3); zoom call with T. Moyron and S. Maizel regarding Customers proposed stipulation (.5).
09/12/22	C. Montgomery	2.10	2,541.00	B230	Review and revise settlement agreement with Fannie Mae (1.2); Zoom call with T. Moyron, T. Meerovich, S. Warren and Fannie Mae representatives regarding operational settlement issues (.7); communications with B. Clarke regarding limited waiver documentation (.1); communications with T. Moyron regarding settlement drafts (.1).
09/12/22	C. O'Leary	1.40	1,190.00	B230	Preparation of comments to BSI Interim Servicing Agreement and exchange correspondence re: the same (1.4); exchange correspondence re: counterparty settlements.
09/12/22	T. Moyron	0.10	79.00	B230	Analyze emails from M. Hyland re reporting on funded loans.
09/13/22	T. Moyron	0.20	158.00	B230	Analyze further proposed changes to FNMA settlement.
09/13/22	T. Moyron	0.50	395.00	B230	Call with T. Meerovich, D. Oien, C. Montgomery, et al., regarding Customers.
09/13/22	T. Moyron	1.10	869.00	B230	Call with T. Meerovich, M. Schwarzmman, N. Peterman, et al. re budget and related matters.
09/13/22	S. Maizel	0.50	485.00	B230	Zoom conference with A. Samples, T. Meerovich, etc. re Customers issues.

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09/13/22	C. Montgomery	4.40	5,324.00	B230	Communications with J. John regarding TIAA meeting (.1); Zoom call with A. Samples, T. Moyron, D. Oien, T Meerovich and others (.5); cash flow DIP Lender updated recoveries analysis (1.4); review Fannie Mae settlement and suggest edits to agreement (1.2); communications with T. Moyron, A. Samples and T. Meerovich regarding same (.2); review Fannie Mae Form 629 (.2); communications with S. Warren regarding same (.2); phone call with T. Moyron regarding same and blocked account transfers (.6).
09/13/22	C. O'Leary	0.60	510.00	B230	Preparation of comments to BSI Interim Servicing Agreement and exchange correspondence re: the same (0.4); OC E. Oliver re: MLPAs and set-off rights analysis (0.2).
09/13/22	E. Smith	0.50	512.50	B230	Attended conference with FGMC working group regarding Customers stipulation and terms for release of equity in loans sold off the Customers warehouse line.
09/13/22	E. Smith	0.20	205.00	B230	Attended cash flow DIP lender update call.
09/14/22	E. Smith	0.90	922.50	B230	Reviewed and prepared correspondence regarding bridge loan refinancing questions (0.4); reviewed pre-petition bridge loan agreement loan refinancing documentation (0.5).
09/14/22	C. O'Leary	2.40	2,040.00	B230	Preparation of set-off/holdback analysis and exchange correspondence re: the same (0.8); exchange correspondence re: pre-petition bridge loan and related custodial agreements (0.8); review/analyze MLPAs and PSAs in connection with holdback/set-off analysis (0.8).
09/14/22	C. O'Leary	1.80	1,530.00	B230	Plan/prepare for /conduct telephone conference with FTI and FGMC re: counterparty holdback and setoff analysis and related matters.

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Date	Timekeeper	Hours	Amount	Task	Narrative
09/14/22	C. Montgomery	1.00	1,210.00	B230	Communications with S. Warren, J. Taylor, T. Meerovic regarding Fannie Mae settlement documentation (.3); communications with A. Samples, K. Ziman regarding release of blocked funds (.2); communications with M. Hyland and T. Moyron regarding Flagstar remittances (.5).
09/14/22	C. Montgomery	0.30	363.00	B230	Communications with T. Meerovich regarding impact of Fanny Mae on BSI obligations.
09/14/22	T. Moyron	0.80	632.00	B230	Analyze correspondence from J. Taylor, C. Montgomery, et al., re finalization and execution of documents (.4); prepare email to counsel for TCB (.1) and analyze further emails regarding same from C. Montgomery, FGMC, et al. (.3).
09/14/22	T. Moyron	0.60	474.00	B230	Analyze Mass Mutual and TIAA draft letters (.2); correspond with C. Montgomery regarding same (.2); analyze correspondence from T. Meerovich, et al., re same (.2).
09/14/22	T. Moyron	0.30	237.00	B230	Analyze M. Hyland, et al., correspondence regarding Flagstart and related issues.
09/14/22	T. Moyron	0.70	553.00	B230	Conference call with T. Meerovich re Budget and related matters.
09/14/22	S. Maizel	0.50	485.00	B230	Zoom conference with T. Meerovich, etc. re Balbec repurchase of EBOs, etc.
09/14/22	S. Maizel	1.70	1,649.00	B230	Zoom conference with A. Samples, T. Meerovich, etc. re holdbacks, setoffs, etc.
09/14/22	T. Moyron	0.80	632.00	B230	Zoom meeting with A. Samples, D. Oien, T. Meerovich, J. John, et al., re Committee requests for information and documents.
09/14/22	T. Moyron	0.40	316.00	B230	Conference call with A. Samples, T. Meerovich, and representatives from Balbec et al., re Balbec repurchase loan discussions.
09/14/22	T. Moyron	1.10	869.00	B230	Teams meeting with T. Meerovich, A. Samples, D. Oien, et al., re priority items, including counter party claims, employee matters, etc.

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09/15/22	T. Moyron	1.40	1,106.00	B230	Conference call with E. Howe, T. Meerovich, C. Montgomery, et. al., regarding budget, litigation and Customers.
09/15/22	T. Moyron	0.80	632.00	B230	Call with N. Peterman, M. Schwarzmann, T. Meerovich et al. re Budget.
09/15/22	T. Moyron	0.20	158.00	B230	Zoom with T. Meerovich, L. Manning, and S. Maizel.
09/15/22	T. Moyron	0.40	316.00	B230	Call with D. Oien, J. Greenspoon, et al., re First Line.
09/15/22	C. O'Leary	1.20	1,020.00	B230	Exchange correspondence re: FGMC re: Custodial Agreement and PIMCO bridge funded loans (0.5); exchange correspondence re: response to credits' committee inquiries (0.4); preparation of Interim Servicing Agreement and exchange correspondence re: the same (0.3).
09/15/22	E. Smith	1.60	1,640.00	B230	Attended call with representatives from cash flow DIP lender, counsel for lender, FGMC, FTI and Dentons, T. Moyron, for update on current post-petition operating results and liquidity needs of FGMC.
09/15/22	S. Maizel	2.50	2,425.00	B230	Telephone conference with GT, FTI, M. Schwarzmann, etc. re budget issues (.8); telephone conference with T. Meerovich and T. Moyron re same (.2); telephone conference with M. Schwarzmann, GT, etc. re budget issues (1.5).
09/15/22	C. Montgomery	0.50	605.00	B230	Participate in update zoom call with Cash Flow DIP Lender including M. Schwarzman and T. Meerovich and T. Moyron.
09/16/22	C. Montgomery	0.30	363.00	B230	Communications with G Miller regarding surety bond deposits under Cash Flow DIP Order (.1); communications with J. Taylor, A. Samples and T. Meerovich regarding Fannie Mae Closing (.2).
09/16/22	E. Smith	0.70	717.50	B230	Prepared and delivered instruction to FGMC subservicer to segregate and turn over remittances to warehouse provider that had funded the loans prepetition.

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Date	Timekeeper	Hours	Amount	Task	Narrative
09/19/22	C. Montgomery	3.90	4,719.00	B230	Review text of budget testing waiver dated 9/15/22 (.1); review most recent compliance report (.2); Communications with T. Moyron and S. Maizel regarding budget updates for professional fees (.1); communications with E. Howe, T. Moyron regarding proposed Customers Stipulation (.1); review new draft Customers Bank Stipulation (.3); revise draft Customers stipulation (2.2); Zoom call with S. Maizel, T. Moyron, L. Jones regarding budget and plan funding issues (.9).
09/19/22	C. Montgomery	1.50	1,815.00	B230	Zoom call T. Meerovich, T. Moyron, L. Manning, S. Maizel regarding DIP Budget and plan funding issues (1.5).
09/19/22	S. Maizel	2.80	2,716.00	B230	Zoom conference with FTI, etc. re budget issues (1.7); zoom conference with PSZJ, T. Moyron, etc. re budget issues (1.0); review and respond to emails re budget issues (.1).
09/19/22	C. O'Leary	1.00	850.00	B230	Plan/prepare for/conduct telephone conference with T. Moyron, FGMC and FTI re: setoff analysis, BSI ISA and related matters and exchange correspondence re: the same.
09/19/22	T. Moyron	1.50	1,185.00	B230	Zoom meeting with T. Meerovich, L. Manning, C. Montgomery, S. Maizel, et al., regarding budget, plan and next steps.
09/19/22	T. Moyron	0.90	711.00	B230	Call with S. Maizel, M. Caloway, L. Jones, C. Montgomery, et al., regarding budget, plan matters, cash flow DIP lender, and Committee.
09/20/22	C. O'Leary	1.50	1,275.00	B230	Plan/prepare for/conduct TC Planet's counsel re: PSAs and related counterparty agreements (0.8); review/analyze Planet PSA and related counterparty analysis (0.4); preparation of BSI ISA and exchange correspondence re: the same (0.3).
09/20/22	T. Moyron	0.20	158.00	B230	Analyze A. Samples, et al., emails regarding MLPA for NQM trade.
09/20/22	T. Moyron	0.30	237.00	B230	Analyze emails from M. Hyland, et al., regarding FHLMC and Customers.

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09/20/22	T. Moyron	0.30	237.00	B230	Teams meeting with N. Peterman, M. Schwarzmann, A. Samples, et al., regarding pending issues, including Committee, WARN, and related matters.
09/20/22	T. Moyron	0.10	79.00	B230	Analyze email from M. Hyland re reporting on funded loans.
09/20/22	C. Montgomery	3.30	3,993.00	B230	Continued revisions and comments on GT draft Customers Stipulation (1.8); communications with M. Hyland and T. Moyron regarding Freddie Mac Settlement payment (.2); phone call with L. Macksoud re Customers Stipulation issues (.1); communications with L. Manning regarding privileged budget forecast (.1); participate in Teams call with Cask Flow DIP Lender including M. Schwarzman, N. Peterman, A. Samples, T. Meerovich and others (.6); communications with M. Hyland regarding Freddie Mac settlement credit (.4); communications with M. Hyland regarding Customers legal fee charges (.1).
09/20/22	E. Smith	0.70	717.50	B230	Attend operations update call with cash flow DIP lender representatives, M. Schwarzmann and N. Pederson, FGMC, A. Samples, FTI, T. Meerovitch, and Dentons, T. Moyron.
09/20/22	S. Maizel	0.50	485.00	B230	Zoom conference with FTI, etc. re surety bonds requirements.
09/21/22	S. Maizel	0.30	291.00	B230	Telephone conference with T. Moyron and FTI re budget issues.
09/21/22	S. Maizel	1.10	1,067.00	B230	Zoom conference with UCC counsel and BRG re budget issues.
09/21/22	S. Maizel	0.10	97.00	B230	Review and respond to emails re GNMA whole loan trades.
09/21/22	T. Moyron	0.20	158.00	B230	Analyze email from P. Noring regarding Non-QM loans sold to PIMCO (.1); prepare email to G. Reyes re inquiries from P. Noring (.1).
09/21/22	T. Moyron	0.40	316.00	B230	Correspond with T. Meerovich re NOLs (.2); follow up emails with C. Montgomery, et al., re NOLs (.2).

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09/21/22	C. O'Leary	0.60	510.00	B230	Preparation of final BSI Interim Servicing Agreement and exchange correspondence re: the same.
09/21/22	C. Montgomery	0.10	121.00	B230	Communications with counsel for JVB regarding request to remit funds.
09/22/22	T. Moyron	0.20	158.00	B230	Correspond with J. Feldsher, L. Macksoud, et al., re request for loan detail from Flagstar.
09/22/22	T. Moyron	0.30	237.00	B230	Correspond with M. Hyland re budget (.1) and analyze related matters and timing (.2).
09/22/22	T. Moyron	0.10	79.00	B230	Analyze email from M. Hyland re reporting.
09/22/22	S. Maizel	0.50	485.00	B230	Zoom conference with T. Moyron, FTI, etc. re budget issues.
09/22/22	C. Montgomery	0.60	726.00	B230	Communications with T. Meerovich, T. Moyron, M. Hyland re DIP Budget Compliance (.1); draft waiver request and communications with T. Moyron re same (.4); communications from E. Howe re waiver acceptance (.1).
09/23/22	C. O'Leary	1.40	1,190.00	B230	Plan/prepare for/conduct telephone call with John Rosenthal re: DBNTC Custodial Agreements and exchange correspondence re: the same.
09/24/22	C. Montgomery	0.10	121.00	B230	Communications with G. Miller, C. O'Leary and T. Moyron regarding DBTC expenses.
09/26/22	C. O'Leary	0.60	510.00	B230	Preparation of disclosure statement with respect to BSI Purchase and Sale Agreement.
09/26/22	T. Moyron	1.20	948.00	B230	Call with M. Schwarzmman, N. Peterman, T. Meerovich, C. Montgomery, et al. re wind-down and plan issues.
09/26/22	S. Maizel	1.00	970.00	B230	Zoom conference with M. Schwarzmman, etc. re budget issues.
09/27/22	S. Maizel	1.00	970.00	B230	Zoom conference with FTI, A. Samples, etc. re Flagstar issues.
09/27/22	E. Smith	0.70	717.50	B230	Attended update call among representatives of cash flow DIP lender, M. Schwarzmman and N. Peterman, FGMC, A. Samples, FTI, T. Meerovich, and Dentons, T. Moyron.

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Date	Timekeeper	Hours	Amount	Task	Narrative
09/27/22	T. Moyron	1.10	869.00	B230	Conference call with M. Schwarzmman, A. Samples, C. Montgomery, et al., re Customers (.5); conference call with M. Schwarzmman re same (.1); conference call with A. Samples, T. Meerovich, et al., re priority items (.3); analyze emails from A. Samples, et al., re Balbec EBO Trade (.2).
09/27/22	C. O'Leary	0.80	680.00	B230	Preparation of Disclosure Statement Plan and exchange correspondence re: the same.
09/27/22	C. Montgomery	0.50	605.00	B230	Zoom call with M. Schwarzman, T. Meerovich, A. Samples E. Howe regarding impact of new Customers Bank working capital guaranty demand.
09/28/22	C. Montgomery	0.20	242.00	B230	Communications with A. Samples and L. Macksoud regarding Customer turnover request and accounting timing.
09/28/22	C. O'Leary	0.20	170.00	B230	Exchange correspondence re: DB invoices.
09/29/22	C. O'Leary	0.90	765.00	B230	Plan/prepare for/conduct telephone conference with FTI and FGMC re: priority items related to warehouse financing and counterparty agreements.
09/29/22	C. Montgomery	2.20	2,662.00	B230	Participate in Zoom call regarding Customers/planet home sale closing issues (.7); follow up call S. Maizel (.3); participate in zoom call with Cash Flow DIP Lender regarding Customers Loan sale review including A. Samples, T. Meerovich, M. Schwarzmman (1.0); follow up call regarding Customers Bank behavior with T. Moyron and N. Peterman (.2).
09/29/22	E. Smith	1.10	1,127.50	B230	Attended update call with representatives of cash flow DIP lender, M. Schwarzmman and N. Peterman, FGMC, A. Samples, FTI, T. Meerovich, and Dentons, T. Moyron.
09/29/22	S. Maizel	1.10	1,067.00	B230	Zoom conference with FTI, FGMC, M. Schwarzmman, etc. re Customers loans (.7); telephone conference with C. Montgomery re same (.3); telephone conference with M. Schwarzmman re same (.1).
09/29/22	S. Maizel	0.10	97.00	B230	Telephone conference with L. MacSoud re Planet Home issues.

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09/29/22	S. Maizel	1.90	1,843.00	B230	Zoom conference with GT, FGMC, FTI, etc. re budget issues.
09/30/22	C. Montgomery	0.50	605.00	B230	Prepare and participate in Phone Call with E. Howe regarding Customers Bank issues.
09/30/22	T. Moyron	1.00	790.00	B230	Participate in Board meeting re settlement, releases, and plan and DS (.4); call with C. Montgomery re same (.1). Call with A. Samples, T. Meerovich, et al. re Barings follow up (.5).
Subtotal		139.00	135,528.50		

B240 - Tax Issues

Date	Timekeeper	Hours	Amount	Task	Narrative
09/21/22	C. Montgomery	0.70	847.00	B240	Communications and phone call with R. Williams regarding NOL preservation and transfer issues (.5); review 2020 tax return (.2).
09/22/22	R. Williams	1.00	1,040.00	B240	Call with Claude Montgomery concerning bankruptcy NOL matter (.6); attention to same (.4).
09/22/22	S. Dhaliwal	2.60	2,028.00	B240	Research regarding use of NOLs in bankruptcy.
09/22/22	C. Montgomery	0.70	847.00	B240	Review 2020 tax return (.1); communications with R. Williams regarding NOL issue (.6).
09/23/22	C. Montgomery	0.10	121.00	B240	Communications with L. Manning regarding NOL issues.
09/23/22	S. Dhaliwal	3.20	2,496.00	B240	Continue research regarding use and limitations on NOLs in bankruptcy.
09/24/22	R. Williams	2.60	2,704.00	B240	Attention to NOL rules for bankruptcy proceedings.
09/26/22	R. Williams	0.30	312.00	B240	Analysis of NOL structure alternatives.
09/29/22	C. Montgomery	0.10	121.00	B240	Communications with L. Manning regarding NOL analysis.
09/29/22	S. Dhaliwal	1.20	936.00	B240	Research regarding limitations on NOLs for creditors/stockholders acquiring NOLs through bankruptcy proceeding.

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Date	Timekeeper	Hours	Amount	Task	Narrative
09/30/22	S. Dhaliwal	2.60	2,028.00	B240	Continue research regarding use of NOLs in bankruptcy.
	Subtotal	15.10	13,480.00		

B260 - Board of Directors Matters

Date	Timekeeper	Hours	Amount	Task	Narrative
09/02/22	C. Montgomery	1.50	1,815.00	B260	Teams call with L. Manning, N. Sombuntham, W. Nolan, T. Moyron, S. Maizel regarding draft board presentation.
09/07/22	S. Maizel	1.00	970.00	B260	Zoom conference with Board of Directors.
09/07/22	E. Smith	0.90	922.50	B260	Attended meeting of FGMC board of directors.
09/07/22	T. Moyron	1.00	790.00	B260	Participate in Board call regarding budget and other related matters.
09/07/22	S. Schrag	0.60	390.00	B260	Participate in Board call.
09/19/22	S. Schrag	0.20	130.00	B260	Confer with T. Moyron regarding Board Minutes (.1); review correspondence regarding the same (.1).
09/19/22	C. Montgomery	0.60	726.00	B260	Phone call with L. Whidden regarding background for board minutes review.
09/26/22	C. Montgomery	1.20	1,452.00	B260	Participate on Board call regarding plan process.
09/26/22	T. Moyron	1.10	869.00	B260	Participate in Board call with K. Verner and other Board members, T. Meerovich, et al. regarding budget issues, DS and plan, and Committee matters.
09/28/22	T. Moyron	0.30	237.00	B260	Prepare emails to Board regarding Committee and Cash Flow DIP lender settlement discussions and related issues.
09/28/22	C. Montgomery	0.10	121.00	B260	Confer with T. Moyron regarding board advice update note.
09/30/22	C. Montgomery	3.30	3,993.00	B260	Participate in board call (.5); research indemnification decision by board and communication of results to T. Moyron (2.8).
09/30/22	E. Smith	0.50	512.50	B260	Attended meeting of the FGMC board of directors.

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Date	Timekeeper	Hours	Amount	Task	Narrative
09/30/22	S. Schrag	0.40	260.00	B260	Participate in and take notes during Board call.
09/30/22	T. Moyron	0.50	395.00	B260	Participate in Board meeting re plan matters.
	Subtotal	13.20	13,583.00		

B300 - Claims and Plan

Date	Timekeeper	Hours	Amount	Task	Narrative
09/01/22	E. Smith	1.10	1,127.50	B300	Prepare pre-petition facility default interest summary.
09/03/22	E. Smith	1.20	1,230.00	B300	Prepare for call with Dentons team, T. Moyron, regarding creditor claim review (.6); confer with T. Moyron, S. Maizel and C. Montgomery regarding exit strategy for termination of post-petition loan servicing activities (.6).
09/04/22	D. Cook	5.50	3,410.00	B300	Draft combined plan/DS inserts regarding sale and settlement pleadings (1.8); draft combined plan/DS insert regarding claims agent information (.3); email communications with T. Moyron regarding combined plan/DS (.2) telephone conference with T. Moyron regarding same (.1); zoom conference with Dentons and PSZJ regarding combined plan/DS (1.5); zoom conference with Dentons and PSZJ regarding sale and solicitation procedures (.6); video conference with Dentons and FTI regarding combined plan/DS and investment banker retention (1.0).
09/05/22	D. Cook	1.40	868.00	B300	Video conference with Dentons, FTI, and PSZJ regarding combined plan/DS status and next steps (1.3); email communication with T. Moyron regarding same (.1).

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Date	Timekeeper	Hours	Amount	Task	Narrative
09/06/22	D. Cook	9.90	6,138.00	B300	Revise combined plan/DS in light of C Montgomery comments (.4); revise plan in light of GT comments (2.0); zoom conference with client regarding filing of combined plan/DS (.6); telephone conferences with T. Moyron regarding combined plan/DS revisions (.8); revise combined plan/DS for needed changes prior to filing (4.2); email communications with Debtor professionals regarding revisions to combined plan/DS (1.6); email communications with GT regarding revisions to combined plan/DS (.2); email communications with PSZJ regarding filing of combined plan/DS (.1).
09/09/22	E. Smith	0.70	717.50	B300	Confer with Claude Montgomery regarding servicing advance determinations.
09/19/22	D. Cook	0.50	310.00	B300	Email correspondence with T. Moyron regarding solicitation procedures objection deadline (.1); draft proposed language in connection with reservation of rights in connection Govt proposed language regarding Ginnie Mae dispute in combined plan/disclosure statement (.4).
09/20/22	D. Cook	0.40	248.00	B300	Analysis in connection with plan supplement filing requirement at request of T. Moyron (.3); draft email to T. Moyron concerning same (.1).
09/21/22	D. Cook	2.80	1,736.00	B300	Analyze combined Plan/DS for statement concerning supplemental asset list in response to UST inquiry with respect to disclosure statement (1.2); analyze solicitation procedures motion regarding same (.8); analyze bid procedures motion regarding same (.8).
09/27/22	C. Montgomery	0.30	363.00	B300	Review FTI WARN claim analysis.
	Subtotal	23.80	16,148.00		

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B310 - Claims Administration and Objections

Date	Timekeeper	Hours	Amount	Task	Narrative
09/02/22	S. Schrag	0.30	195.00	B310	Participate in reoccurring call to discuss plan, potential claims regarding interest payments.
09/07/22	G. Miller	0.40	308.00	B310	Call with M.Jacobson and J.John re critical vendor issues.
09/16/22	G. Miller	1.20	924.00	B310	Review draft pledge agreement with Liberty Mutual and related order authorizing debtor to maintain surety bond program (.9); Emails with M.Calloway, T.Moyron and D.Oien re same (.3).
09/19/22	G. Miller	0.40	308.00	B310	Call with M.Calloway re surety bonds (.2); Emails with C.Montgomery and M.Calloway re same (.2).
09/20/22	G. Miller	0.40	308.00	B310	Call with M.Calloway, T.Moyron, T.Meerovich, and D.Oien re surety bonds.
09/20/22	S. Ruben	0.10	52.50	B310	Correspond with Dentons and employee claims and WARN Act issues.
09/21/22	S. Ruben	2.80	1,470.00	B310	Correspond with Dentons and KCC re discussing 40 employee claims and WARN Act (.1); analyze WARN Act claims (.2); attend conference with Dentons team re WARN claims analysis (.3); correspond with Dentons team re WARN claims and related litigation claims (.2); correspond with C. Doherty re review of claims (.1); conference with C. Doherty re preparing WARN claims spreadsheet (.3); draft spreadsheet for WARN Act and wage claims (1.6).
09/21/22	S. Maizel	0.20	194.00	B310	Review proof of claim re qui tam case.
09/22/22	S. Ruben	1.80	945.00	B310	Draft spreadsheet of analysis of 40 employee claims (1.4); correspond with C. Doherty re analysis of the same (.1); further revise spreadsheet per T. Moyron comments (.3).
09/23/22	G. Miller	0.20	154.00	B310	Emails with C.O'Leary re DB outstanding invoices.
09/25/22	G. Miller	0.30	231.00	B310	Email J.John re payment of DB invoices.

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Date	Timekeeper	Hours	Amount	Task	Narrative
09/28/22	S. Ruben	0.30	157.50	B310	Correspond with Dentons re status of WARN Act and wage claims (.1); analyze recently filed claims (.2).
09/29/22	S. Ruben	1.50	787.50	B310	Correspond with C. Doherty re recently filed employee claims (.1); analyze recently filed employee claims (1.3); correspond with Dentons team re the same (.1).
Subtotal		9.90	6,034.50		

B320 - Plan and Disclosure Statement (incl. Business Plan)

Date	Timekeeper	Hours	Amount	Task	Narrative
09/01/22	S. Maizel	1.20	1,164.00	B320	Zoom conference with G. Miller, C. Montgomery, etc. re Fannie Mae settlement issues (.7); review and respond to emails re same (.5).
09/02/22	S. Maizel	0.90	873.00	B320	Zoom conference with C. Montgomery, L. Smith, etc. re interest rate issues (.5); telephone conference with T. Moyron re plan and disclosure statement issues (.4).
09/02/22	T. Moyron	1.00	790.00	B320	Conference call with S. Maizel re plan and disclosure statement issues (.4); and analyze related matters re plan and disclosure statement (.6).
09/02/22	T. Moyron	1.10	869.00	B320	Analyze email from L. Manning re asset recoveries, budget, liquidation analysis and related matters (.2), and analyze materials and related issues (.8); prepare email to L. Manning re call and materials (.1).
09/03/22	S. Maizel	4.00	3,880.00	B320	Zoom conference with T. Moyron re revisions to combined disclosure statement and plan (3.6); review and respond to emails re same (.4).
09/03/22	T. Moyron	3.60	2,844.00	B320	Zoom meeting with S. Maizel regarding updates to DS and plan and changes thereto.
09/04/22	T. Moyron	1.50	1,185.00	B320	Zoom meeting with S. Maizel, L. Jones, C. Montgomery, T. Cairns, et al. re updated DS and plan and related analysis and matters.

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Date	Timekeeper	Hours	Amount	Task	Narrative
09/04/22	S. Maizel	2.80	2,716.00	B320	Zoom conference with T. Cairns, L. Jones, etc. re plan and disclosure statement issues (1.5); zoom conference with FTI, PSZJ, etc. re plan and disclosure statement revisions (1.0); zoom conference with L. Jones, etc. re same (.3).
09/04/22	C. Montgomery	2.50	3,025.00	B320	Zoom call with T. Moyron, S. Maizel, L. Jones, L regarding plan draft (1.5); provide T. Moyron With specific comments to same (1.0).
09/04/22	L. Macksoud	2.00	1,540.00	B320	Review revised draft plan and disclosure statement (.5) and participate in call with Dentons and PSZJ working groups to discuss same (1.5).
09/04/22	T. Moyron	1.30	1,027.00	B320	Zoom conference with FTI, PSZJ, etc. re plan and disclosure statement revisions (1.0); zoom conference with L. Jones, etc. re same (.3).
09/05/22	L. Macksoud	1.90	1,463.00	B320	Draft responses to open questions on plan and disclosure statement (.5); call with working group to discuss plan and disclosure statement revisions (1.4).
09/05/22	T. Moyron	3.70	2,923.00	B320	Analyze updated DS and Plan, related redlines and matters and prepare comments to same.
09/05/22	T. Moyron	1.40	1,106.00	B320	Correspond and multiple calls with S. Maizel and D. Cook regarding combined DS and Plan.
09/05/22	C. Montgomery	3.70	4,477.00	B320	Zoom call with FTI and T. Moyron regarding disclosure statement and Plan support (1.3); review impairment issue and comment on class 3 and Rejection language (1.6); review plan article 10 and provide suggestions to T. Moyron (.8).

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Date	Timekeeper	Hours	Amount	Task	Narrative
09/05/22	S. Maizel	4.20	4,074.00	B320	Telephone conference with T. Moyron re combined plan and disclosure statement issues (.1); zoom conference with FTI, etc. re combined plan and disclosure statement (1.3); telephone conference with T. Moyron re same (.3); analyzing plan and disclosure statement issues with D. Cook and T. Moyron (1.0); review and respond to emails re combined plan and disclosure statement issues (.5); review and revise plan and disclosure statement provisions (1.0).
09/05/22	T. Moyron	1.30	1,027.00	B320	Call with L. Manning, S. Maizel, T. Cairns, et al., re plan and claims and estimated amounts and recoveries.
09/06/22	T. Moyron	5.10	4,029.00	B320	Analyze and finalize DS and plan and analyze related issues (3.4); correspond with C. Montgomery, S. Maizel and D. Cook re DS and plan (.8); analyze correspondence from FTI, C. Montgomery and analyze related issues re DS and plan re recoveries (.6); correspond with T. Cairns and call re DS and plan (.3).
09/06/22	L. Macksoud	0.80	616.00	B320	Emails with working group on revisions to plan and disclosure statement (.3) and review updated draft (.5).
09/06/22	T. Moyron	0.30	237.00	B320	Call with N. Peterman, T. Cairns, E. Howe and S. Maizel re plan matters.
09/06/22	S. Maizel	2.90	2,813.00	B320	Zoom conference with FTI re plan revisions (.5); zoom conference with M. Schwarzmman, N. Peterman, etc. re plan revisions (.4); telephone conference with FTI and T. Moyron re plan contribution issues (.7); zoom conference with N. Peterman, L. Jones, etc. re plan revisions (.3); review and respond to emails re revisions to the plan (1.0).
09/06/22	T. Moyron	0.70	553.00	B320	Conference call with T. Meerovich, L. Manning, and S. Maizel re plan matters.

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09/06/22	C. Montgomery	4.30	5,203.00	B320	Respond to FTI plan questions (1.8); communications with D. Cook and T. Moyron regarding plan and clarifications (.3); review updated plan and provide further comments re same (.7); respond to E. Howe inquiries re plan (.5); communications with D. Cook, S. Maizel and T. Moyron regarding further plan edits (1.0).
09/07/22	S. Maizel	0.70	679.00	B320	Telephone conference with T. Moyron re budget issues (.4); telephone conference with M. Schwarzmans re same (.3).
09/07/22	T. Moyron	1.00	790.00	B320	Correspond with T. Cairns, et al., re motions to shorten re sale and DS and plan (.2); analyze email from B. Hackman re same (.1); correspond with T. Meerovich, et al. re same (.3); correspond with T. Cairns, et al. re Committee (.2); prepare email to M. Power, et al., re motions to shorten (.1); analyze email from T. Cairns re agenda (.1).
09/07/22	T. Moyron	0.20	158.00	B320	Analyze Committee objection re motions for entry of order shortening time.
09/07/22	T. Moyron	0.30	237.00	B320	Analyze follow up email from B. Hackman regarding plan inquiries (.1) and correspond with L. Jones re same (.1) and prepare email to C. Montgomery re same (.1) re plan.
09/08/22	C. Montgomery	1.20	1,452.00	B320	Review as filed Plan and Disclosure statement (.1); communications with T. Moyron, B. Clarke and UST re same (1.1).
09/08/22	T. Moyron	0.70	553.00	B320	Correspond with M. Power re revised timelines related to sale and plan (.2); correspond with T. Cairns and L. Jones re same (.2); analyze proposed revised timeline (.1); prepare email to KCC inquiring as to voting deadline (.1); and prepare email to N. Peterman re proposed hearing date re plan (.1).
09/08/22	T. Moyron	0.20	158.00	B320	Conference call with L. Jones and T. Cairns following hearing re DS, plan and sale timeline.
09/08/22	T. Moyron	0.20	158.00	B320	Correspond with M. Power regarding comments made at hearing and proposed revised timeline re DS, plan and sale.

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Date	Timekeeper	Hours	Amount	Task	Narrative
09/08/22	C. Montgomery	0.30	363.00	B320	Communications with T. Moyron regarding shorten notice request for combined plan and disclosure statement.
09/12/22	S. Maizel	0.50	485.00	B320	Zoom conference with FTI, S. Warren, etc. re Fannie Mae settlement issues.
09/14/22	C. Montgomery	1.60	1,936.00	B320	Teams call with T. Meerovich, A. Samples, L. Manning, D. Oien, S. Maizel, T. Moyron regarding holdback claim creditor opportunities, and critical case issues.
09/19/22	C. Montgomery	0.30	363.00	B320	Communications with T. Moyron regarding plan comments and Barclays (.1); communications with L. Letman, T. Moyron and D. Cook regarding plan language requested by Ginnie Mae (.2).
09/19/22	T. Moyron	0.40	316.00	B320	Call with N. Peterman re Committee matters.
09/20/22	C. Montgomery	0.10	121.00	B320	Communications with L. Lerner re Ginnie Mae language request.
09/20/22	T. Moyron	0.40	316.00	B320	Zoom meeting with A. Samples re pending issues, including budget and settlement matters.
09/20/22	T. Moyron	0.30	237.00	B320	Conference call with S. Maizel regarding plan matters, including WARN.
09/20/22	T. Moyron	0.10	79.00	B320	Correspond with KCC re hearing on DS and plan.
09/20/22	T. Moyron	0.40	316.00	B320	Analyze matters related to budget and plan.
09/21/22	T. Moyron	0.20	158.00	B320	Prepare emails to L. Lerman re sale and plan.
09/21/22	L. Macksoud	0.60	462.00	B320	Review disclosure statement objection filed by Cigna (.3); review comments on draft plan and disclosure statement from Barclays (.3).
09/21/22	T. Moyron	0.50	395.00	B320	Conference call with S. Maizel and L. Jones regarding DS and plan (.4) and follow up call with S. Maizel regarding same (.1).
09/21/22	S. Maizel	0.40	388.00	B320	Telephone conference with L. Jones and T. Moyron re pending issues, including budget and WARN claims in combined plan and disclosure statement.

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Date	Timekeeper	Hours	Amount	Task	Narrative
09/21/22	C. Montgomery	0.50	605.00	B320	Review Barclays comments on Plan and Disclosure Statement (.3); communications with L. Jones, T. Moyron regarding same (.2).
09/22/22	S. Maizel	2.30	2,231.00	B320	Zoom conference with counsel for the UCC, FTI, etc. re issues towards confirmation of combined plan and disclosure statement (1.1); telephone conference with UCC counsel re negotiations over combined plan and disclosure statement (.3); telephone conference with M. Schwarzmans re budget issues for combined plan and disclosure statement (.9).
09/22/22	T. Moyron	1.00	790.00	B320	Teams meeting with T. Meerovich, L. Manning, M. Caloway, S. Maizel, et al., regarding plan and related analysis.
09/22/22	C. Montgomery	0.10	121.00	B320	Communications with L. Jones regarding Seneca language for disclosure statement.
09/22/22	T. Moyron	0.50	395.00	B320	Analyze email from M. Power re Committee requests (.2); prepare email to M. Power, et al., re call re same (.1); prepare email to D. Oien, et al., re same (.2).
09/23/22	S. Maizel	0.50	485.00	B320	Zoom conference GT attorneys re budget issues.
09/23/22	C. Montgomery	2.60	3,146.00	B320	Review Flagstar comments on combined plan and disclosure statement and communications with L. Macksoud and T. Moyron regarding same.
09/23/22	T. Moyron	0.50	395.00	B320	Conference call with N. Peterman, E. Howe, and S. Maizel regarding plan, timing, and related matters.
09/23/22	T. Moyron	0.40	316.00	B320	Prepare email to M. Caloway re reply to any objections to DS (.1); attention to DS and plan and updates required (.3).
09/23/22	S. Ruben	0.50	262.50	B320	Conference with T. Moyron re drafting reply to disclosure statement objections (.3); draft shell reply to disclosure statement objections (.2).
09/24/22	S. Ruben	1.50	787.50	B320	Draft shell reply to disclosure statement objections.

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09/24/22	C. Montgomery	1.50	1,815.00	B320	Continued work on responses to Flagstar comments (.9); participate in zoom call regarding Committee plan challenges with L. Jones, T. Moyron, S. Maizel, T. Meerovich (.6).
09/24/22	S. Maizel	1.80	1,746.00	B320	Zoom conference with FTI, UCC counsel, GT, etc. re combined plan and disclosure statement issues (.4); telephone conference with PSZJ, FTI, etc. re same (.7); zoom conference with Counsel for UCC and FTI (.7).
09/25/22	S. Maizel	0.80	776.00	B320	Zoom conference with UCC, FTI, etc. re combined plan and disclosure statement issues.
09/25/22	C. Montgomery	3.80	4,598.00	B320	Phone call T. Moyron regarding feasibility language modification (.1); communications with D. Cook and T. Moyron regarding Flagstar comments (1.4); draft supplemental feasibility language and communications with T. Moyron regarding same(.9); communications with T. Moyron regarding Barclays plan comments (1.4).
09/25/22	T. Moyron	1.40	1,106.00	B320	Conference call with C. Montgomery regarding language in DS and plan (.1); analyze comments to DS and plan re Barclays and Flagstar (.3); prepare email to L. Jones, et al., regarding DS and plan status (.1), and prepare email to A. Samples, et al. re same (.1); prepare emails to counsel for Committee and WARN plaintiff re additional language (.1); analyze status of DS/Plan and additional language to be added regarding feasibility, BSI, FNMA, etc. (.7).
09/25/22	D. Cook	0.30	186.00	B320	Analysis regarding disclosure statement revisions ahead of interim approval hearing.
09/26/22	S. Ruben	0.10	52.50	B320	Correspond with T. Moyron re comments to combined plan and disclosure statement and forthcoming objections.

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Date	Timekeeper	Hours	Amount	Task	Narrative
09/26/22	S. Alberts	3.10	3,069.00	B320	Receive request to draft WARN insert into Joint Plan and Disclosure Statement and respond (.1), assess existing terms of Plan and DS with respect to any existing WARN references (.2), obtain info on pending WARN actions, draft sections on background and treatment of WARN Act claims (2.7) and circulate for review (.1).
09/26/22	T. Moyron	1.30	1,027.00	B320	Call with L. Jones, S. Maizel, T. Cairns, et al., regarding objections and DS and plan (1.0); and follow up call with L. Jones and S. Maizel re same (.3).
09/26/22	T. Moyron	0.30	237.00	B320	Call with T. Meerovich regarding pending matters, including budget, DS and plan.
09/26/22	C. Montgomery	4.10	4,961.00	B320	Communications with T. Moyron and L. Jones regarding plan feasibility language (.2); communications with G. Miller regarding update of Fannie Mae and Freddie Mac language (.2); communications with T. Moyron and B. Clarke regarding Barclays proposed changes (.6); review Seneca Mortgage disclosure objection (.2); Zoom call with Cash Flow DIP lender regarding plan (1.2); review UST disclosure objection (.2); communications with T.C. Liu, J. Feldsher and T. Moyron regarding Flagstar language changes (.5); participate in Zoom call with L. Jones, T. Cairns, T. Moyron regarding interim disclosure statement hearing and resolution of outstanding objections (1.0).
09/26/22	D. Cook	2.60	1,612.00	B320	Analysis regarding filed version of combined plan/DS in order to add additional language to resolve disputes as to adequate disclosures in advance of disclosure statement hearing (.4); revise to incorporate additional language in connection with same (1.2); zoom conference with Dentons, PSZJ and FTI regarding same (1.0).
09/26/22	G. Miller	2.10	1,617.00	B320	Prepare plan and disclosure statement.
09/26/22	S. Maizel	1.30	1,261.00	B320	Zoom conference with PSZJ, et.c re combined plan and disclosure statement issues (1.0); telephone conference with L. Jones re same (.3).
09/27/22	G. Miller	1.50	1,155.00	B320	Revise plan and disclosure statement.

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Date	Timekeeper	Hours	Amount	Task	Narrative
09/27/22	D. Cook	7.90	4,898.00	B320	Draft additional language for Combined plan/DS to in order to resolve disputes as to adequate disclosures ahead of disclosure statement hearing (5.5); zoom conference with C Montgomery and E. Howe regarding combined plan/DS revisions (.8); revise combined plan/DS ahead of filing same along with redline ahead of disclosure statement hearing (1.6).
09/27/22	S. Ruben	1.00	525.00	B320	Correspond with T. Moyron and D. Cook re finalizing liquidation analysis (.1); create list of outstanding inserts for combined plan and disclosure statement (.6); coordinate with D. Cook re combined plan and disclosure statement inserts (.2); correspond with G. Miller and D. Cook re language for FNMA and Freddie settlements (.1).
09/27/22	C. Montgomery	5.50	6,655.00	B320	Communications with C. Knotts regarding disclosure interim approval hearing (.1); prepare for and participate in Flagstar discussion regarding plan and disclosure statement changes with J. Feldsher (1.7); communications with D. Cook and S. Ruben regarding Barclays comments (.2); communications with G. Miller regarding Inserts for Fannie, Freddie and BSI disclosure (.7); communications with D. Cook regarding morning commentary with Flagstar counsel (.1); communications with T. Cairns regarding ballots (.2); attention to Flagstar disclosure issues (.9); communications with B. Clarke and T. Moyron regarding timing of updates to combined plan and disclosure statement (.1); further review of Fannie and Freddie language (.2); further review of Flagstar language and communications with J. Feldsher and T. Moyron regarding same (.5); communications with M. Caloway regarding class 4 definition (.2); communications and Zoom call with E. Howe regarding Cash Flow DIP Lender views on changes to plan and disclosure statement (.6).

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09/27/22	L. Macksoud	4.10	3,157.00	B320	Review additional objections to plan and disclosure statement (.7); call with counsel to Flagstar to discuss comments to same (1.5); confer with Flagstar and PSZJ re comments to bid procedures order (.3); call with FTI and Debtors to discuss status of open issues (1.1); emails with Debtors and Dentons/PSZJ working group to discuss open issues in preparation for hearing (.5).
09/27/22	T. Moyron	0.40	316.00	B320	Analyze email from M. Power and attached Committee proposal (.2); prepare email regarding same (.1); analyze follow up email from Committee counsel re proposal (.1).
09/27/22	T. Moyron	0.30	237.00	B320	Correspond with D. Oien regarding FCA claim and unsealing (.2); analyze related order (.1).
09/27/22	T. Moyron	3.40	2,686.00	B320	Call with N. Peterman re DS and plan matters (.1); analyze updated DS and plan and related redlines (1.3); analyze issues related to Flagstar language requested in DS and plan (.2); analyze emails from counsel for Flagstar re same (.2); correspond with counsel for GNMA re redline (.1); analyze issues related to solicitation procedures and related notices and ballots (.6); conference call with E. Howe, T. Cairns, et al., re same (.5); prepare email to E. Howe and N. Peterman re same (.1); analyze additional language related to Class 4 (.1) and related emails from M. Caloway, et al., regarding Seneca (.2).
09/28/22	T. Moyron	0.30	237.00	B320	Call with T. Meerovich regarding settlement proposal involving Committe and Cash Flow DIP lender and related issues.
09/28/22	T. Moyron	0.80	632.00	B320	Settlement diligence call with FTI, BRG, M. Power, E. Howe et al. re funding, timing, budget, and related issues.
09/28/22	T. Moyron	0.90	711.00	B320	Multiple calls with M. Power regarding hearing, counter offer, and possible continuance (.2); N. Peterman (.1), T. Meerovich (.1), A. Samples (.1); calls and correspondence with L. Jones re same (.4).
09/28/22	T. Moyron	0.20	158.00	B320	Calls with KCC regarding solicitation packages and time required.

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Date	Timekeeper	Hours	Amount	Task	Narrative
09/28/22	S. Ruben	0.10	52.50	B320	Correspond with Dentons team re language for FNMA and Freddie settlements.
09/28/22	D. Cook	6.90	4,278.00	B320	Revise combined plan/DS to incorporate internal comments from C O'Leary (1.0); zoom conference with C Montgomery regarding necessary revisions to combined plan/DS ahead of disclosure statement hearing (.6); revise combined plan/DS in connection with same (5.3).
09/28/22	S. Maizel	0.80	776.00	B320	Zoom conference with UCC, GT, FTI, etc. re combined plan and disclosure statement issues.
09/28/22	C. Montgomery	4.30	5,203.00	B320	Continued Zoom call with E. Howe and D. Cook regarding changes to plan and disclosure statement requested by Flagstar (.7); communications with J. Feldsher regarding same (.1); communications with Fannie Mae, Freddie Mac, Barclays and others regarding same (.6); communications with C. O'Leary, T. Moyron, D. Cook, regarding further edits to combined plan and disclosure statement (.3); review Committee objection to disclosure statement (.2); communications with D. Cook and T. Moyron regarding same (.1); communications with T. Moyron regrading Cash Flow DIP Lender response to Committee settlement proposals and review same (.2); meeting with WARN plaintiff regarding plan with T. Moyron and L. Jones (1.0); confer with L. Jones regarding settlement opportunities (.3); communications with T. Moyron regarding committee avoidance claims (.3); review update comparison of draft plan (.2); review proposed Fannie Mae changes and communications with S. Warren regarding same (.3).
09/28/22	T. Moyron	3.80	3,002.00	B320	Analyze updated DS and plan and redlines and open issues and correspondence with D. Cook re same.

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Date	Timekeeper	Hours	Amount	Task	Narrative
09/29/22	C. Montgomery	4.30	5,203.00	B320	Communications with T. Moyron regarding liquidating trustee issues under plan (.1); review updated committee settlement term sheet (.2); prepare for hearing and communications with T. Moyron, M. Caloway regarding same and updated disclosures (.9); attend hearing on disclosure approval (2.0); brain storming session regarding implementation of committee settlement (.9); communications with D. Cook and T. Moyron regarding Plan changes to reflect Committee settlement (.2).
09/29/22	S. Alberts	0.70	693.00	B320	Review DS approval and whether DS and Plan language was altered regarding WARN issues (.2); receive and review communications about DS and order language (.1) and follow up with proposed suggestion (.2) and responses thereto (.2).
09/29/22	S. Maizel	1.40	1,358.00	B320	Participate by zoom on court hearing on plan and disclosure statement (1.3); telephone conference with T. Moyron re same (.1).
09/29/22	D. Cook	8.30	5,146.00	B320	Revise combined plan/DS ahead of disclosure statement hearing (1.3); zoom conference with E. Howe and C. Montgomery regarding incorporating terms of Committee settlement in combined plan/DS (.9); revise combined plan/DS to incorporate terms of Committee settlement (4.8); further revise combined plan/DS based on T. Moyron comments prior to circulation to lender, Committee, WARN Act counsel (1.3).
09/30/22	C. Montgomery	2.50	3,025.00	B320	Review draft plan revisions for committee settlement and propose changes re same (2.3); review WARN plaintiffs plan language (.2).
09/30/22	T. Moyron	0.80	632.00	B320	Correspond with C. Montgomery, D. Oien, et al., re plan matters.
	Subtotal	157.90	142,887.00		

B400 - Bankruptcy-Related Advice

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Date	Timekeeper	Hours	Amount	Task	Narrative
09/20/22	L. Macksoud	0.70	539.00	B400	Call with C. Montgomery to discuss disclosure statement hearing (.3); call with counsel to Planet Home to discuss executory contract treatment and MSR PSA issues (.4).
09/22/22	L. Whidden	3.70	3,589.00	B400	Review information requests of UCC in preparation for call with counsel (.3); review UCC settlement material (.9); review plan and disclosure statement provisions (.7); confer with C Montgomery re: outstanding issues regarding plan and liquidation trust and UCC informational requests (.5); review additional background material regarding Debtor's pre-petition business practices relating to questions posed by UCC (1.3).
09/23/22	L. Whidden	0.60	582.00	B400	Review communications with FTI Consulting in responsive material to Unsecured Creditors Committee informational requests (.5); review email exchanges between Tania Moyron and Committee counsel (.1).
09/25/22	L. Whidden	1.80	1,746.00	B400	Prepare for all hands call with Committee counsel (.6); participate on call (.8); confer with C. Montgomery re: status of plan negotiations (.3); review email from Tania Moyron re: information requests (.1).
09/28/22	L. Whidden	0.70	679.00	B400	Review Committee settlement proposal (.3); communications with C Montgomery re: same (.4).
	Subtotal	7.50	7,135.00		

B410 - General Bankruptcy Advice/Opinions

Date	Timekeeper	Hours	Amount	Task	Narrative
09/14/22	M. Maddy	1.00	350.00	B410	Conduct search and retrieval of documents not electronically available.
	Subtotal	1.00	350.00		

EMP - Employee matters

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Date	Timekeeper	Hours	Amount	Task	Narrative
09/01/22	T. Moyron	0.40	316.00	EMP	Exchange emails with S. McCandless re labor matter and call with S. McCandless and S. Maizel re same.
09/01/22	S. McCandless	0.40	394.00	EMP	Discussion with T. Moyron and S. Maizel regarding text from employee to D. Oien and follow up to same.
09/02/22	T. Moyron	0.40	316.00	EMP	Analyze amended complaint and related motion to dismiss, order, and other pleadings re discrimination lawsuit (.3); prepare emails to L. Manning and D. Oien re same (.1).
09/02/22	T. Moyron	0.20	158.00	EMP	Correspond with S. McCandless re labor matter.
09/02/22	S. McCandless	2.00	1,970.00	EMP	Review and analyze anonymous texts received from D. Oien regarding employment matter (.60); conference call with D. Oien, T. Moyron, and S. Maizel regarding response to same and further discussion with D. Oien (.80); research regarding sender of same (.60).
09/02/22	S. McCandless	0.30	295.50	EMP	Discuss upcoming employment work with D. Oien.
09/04/22	S. McCandless	0.80	788.00	EMP	Review discrimination/harassment lawsuit received from C. Doherty.
09/06/22	S. McCandless	2.80	2,758.00	EMP	Detailed review of and consider response communication from employee (.80); draft and revise response (1.00); review and consider D. Oien's revisions to same (.20); respond to same (.10); review background information on discrimination lawsuit received from C. Doherty (.70).
09/06/22	S. McCandless	0.20	197.00	EMP	Instructions to J. Peterson regarding work to be done on upcoming employment matters.
09/07/22	J. Peterson	0.70	367.50	EMP	Analyze KERP and KEIP orders and draft a timeline of upcoming deadlines.
09/07/22	S. McCandless	0.20	197.00	EMP	Plan for upcoming employment deadlines with J. Peterson.
09/07/22	S. McCandless	0.80	788.00	EMP	Review Buckley WARN class action complaint filed in bankruptcy proceeding (.50); communicate with S. Alberts regarding WARN employment questions and affirmative defenses for same (.30).

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Date	Timekeeper	Hours	Amount	Task	Narrative
09/08/22	S. McCandless	0.60	591.00	EMP	Review and analyze email from D. Oien regarding various labor matters.
09/08/22	S. Maizel	0.40	388.00	EMP	Review and respond to emails re UCC remaining objection to Employee Obligations Motion.
09/12/22	S. Maizel	0.50	485.00	EMP	Zoom conference with Megan Hyland re KERP issues.
09/12/22	S. McCandless	1.00	985.00	EMP	Wind down staffing discussion with D. Oien and J. John.
09/12/22	J. Peterson	1.00	525.00	EMP	Discussion with the client regarding employee matters.
09/12/22	J. Peterson	2.00	1,050.00	EMP	Discussions with S. McCandless regarding WARN notices, OWBPA list, and other matters in preparation for the call with the client.
09/12/22	S. McCandless	2.00	1,970.00	EMP	Review prior employment documentation in preparation for conference call with clients regarding upcoming employment actions (1.0); create detailed agenda and discuss same in detail with J. Peterson to prepare for client call (1.0).
09/13/22	J. Peterson	2.50	1,312.50	EMP	Analyze law regarding the liquidating fiduciary defense to providing 60 days WARN notice to employees (1.5); draft the WARN Notice for the late October layoff (1.0).
09/13/22	J. Peterson	1.80	945.00	EMP	Analyze FGMC's filed documents related to its financial status in order to begin drafting the WARN notice.
09/13/22	S. Maizel	0.40	388.00	EMP	Review and respond to emails re withdrawal of UCC objection to Employee Wage Motion treatment of Former Employees.

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Date	Timekeeper	Hours	Amount	Task	Narrative
09/13/22	S. McCandless	3.90	3,841.50	EMP	Communicate with J. John regarding WARN notice to remaining employees (.30); research liquidating fiduciary defense for specific language for drafting of WARN notice (.70); review prior WARN notices for same (.40); provide related instructions to J. Peterson regarding same (.30); communicate with Dentons bankruptcy team regarding language needed for liquidating fiduciary language of WARN notice (.30); related review of bankruptcy filing documentation and provide instruction to J. Peterson regarding same for preparation of first draft of WARN notice (.60); review and analyze first draft of WARN notice to remaining employees (.40); provide instructions to J. Peterson for initial revisions to same (.30); review new draft and further revise same with J. Peterson (.60).
09/13/22	T. Moyron	0.30	237.00	EMP	Call with S. Alberts, S. Maizel, et al. regarding WARN and response to complaint (partial).
09/14/22	S. McCandless	4.30	4,235.50	EMP	Further consider and revise WARN letter to remaining FGMC employees (.80); prepare detailed email to Dentons bankruptcy team regarding components of same and reasoning used for their review of same (.70); communicate with S. Alberts and T. Moyron regarding same (.30); review and consider S. Alberts' proposed changes (.20); respond to same (.10); communicate with J. John regarding WARN notice (.10); revise WARN letter incorporating some of S. Alberts' proposed changes (.70); re-forward same with comments to Dentons team (.20); review T. Moyron's further changes to WARN letter (.20); further revise and finalize same to incorporate said changes (.40); forward final version to J. John and D. Oien with comments on same (.40); review S. Smith's list of employment-related accounting to be done in follow up to staffing discussion (.20).
09/14/22	R. Heidenreich	1.20	1,116.00	EMP	Various calls regarding staffing and direction on preparation of answer to class action WARN Act complaint.

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Date	Timekeeper	Hours	Amount	Task	Narrative
09/15/22	M. Harriss	2.20	1,001.00	EMP	Receive, review, and analyze adversary proceeding complaint for federal WARN Act claims filed in Delaware bankruptcy proceeding and affirmative defenses and responses to substantive allegations of complaint in answer to be prepared, including strategy work with litigation team regarding same, as well as review of applicable local rules governing pleadings (1.5); review and revise list of questions to gather information for answer and defenses (.7).
09/16/22	S. McCandless	0.30	295.50	EMP	Communicate with J. John regarding WARN notice matters for 9-16 notices.
09/20/22	M. Harriss	2.10	955.50	EMP	Review and revise draft answer and affirmative defenses to class action adversary proceeding complaint.
09/20/22	S. Maizel	0.50	485.00	EMP	Zoom conference with PSZJ, etc. re WARN issues.
09/21/22	S. Maizel	0.30	291.00	EMP	Zoom conference with T. Moyron, C. Doherty, etc. re WARN issues.
09/21/22	M. Harriss	1.80	819.00	EMP	Work to revise and finalize draft of answer and affirmative defenses, with particular focus on incorporating edits and addressing additional comments and making other substantive edits.
09/21/22	J. Peterson	4.50	2,362.50	EMP	Analyze case law regarding whether commissions are included in WARN Act damages.
09/22/22	S. Maizel	0.50	485.00	EMP	Zoom conference with FTI, D. Oien, etc. WARN claims.
09/22/22	M. Harriss	0.70	318.50	EMP	Additional edits and revisions to draft answer and affirmative defenses.
09/23/22	M. Harriss	1.00	455.00	EMP	Receive, review, and analyze employee files for named plaintiffs and revise answer to particular allegations in complaint to reflect and address information contained therein.
09/25/22	M. Harriss	0.40	182.00	EMP	Revise substantive responses to certain allegations in complaint in draft response and develop and draft outline of additional information and/or confirmations needed to finalize answer and affirmative defenses by deadline.

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Date	Timekeeper	Hours	Amount	Task	Narrative
09/26/22	M. Harriss	0.20	91.00	EMP	Additional work on answer and affirmative defenses, including communications with litigation team and others regarding additional confirmations needed to finalize pleadings.
09/26/22	S. Maizel	0.50	485.00	EMP	Zoom conference with FTI re WARN issues.
09/27/22	S. Maizel	0.50	485.00	EMP	Zoom conference with FTI, etc. re WARN issues (.3); review and respond to emails re same (.2).
09/27/22	M. Harriss	1.50	682.50	EMP	Additional communications with bankruptcy team to further address and prepare answer and affirmative defenses and work to revise and finalize draft of same; review and analyze employee data provided to plaintiffs' counsel and cross-reference admissions in answer to ensure consistency, and draft additional substantive responses in light of data received.
09/28/22	M. Harriss	1.70	773.50	EMP	Communicate with litigation and bankruptcy team regarding particular allegations and responses thereto, as well as affirmative defenses (.7); and continue work to revise and finalize same for filing, including communication with client related to same (1.0).
09/29/22	M. Harriss	3.20	1,456.00	EMP	Receive, review, and analyze additional information and confirmations provided by client to certain Complaint allegations (1.0); communicate with R. Heidenreich on certain strategy decisions for particular allegations (.3); revise and finalize draft answer and affirmative defenses in light of new information and communicate with litigation and bankruptcy team regarding same (1.9).
09/29/22	S. Maizel	0.50	485.00	EMP	Zoom conference re KEIP issues with FTI.

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Date	Timekeeper	Hours	Amount	Task	Narrative
09/30/22	M. Harriss	4.30	1,956.50	EMP	Continue work to revise and finalize answer and affirmative defenses, including work to address and incorporate various partner edits and comments, as well as detailed strategy conferences related to same, particularly with respect to certain material allegations pertaining to named Plaintiffs and their reporting and assignment facts and allegations (1.5); review and analyze recent class-certification order from assigned Judge in similar WARN class action, assess strategic implications of same, and revise answer accordingly; communicate with client to secure filing approvals (1.5); communicate and work with local counsel to timely file answer and affirmative defenses, including confirmatory research on particular issues impacting filing (1.3).
Subtotal		57.80	40,679.00		

INS - Insurance

Date	Timekeeper	Hours	Amount	Task	Narrative
09/19/22	T. Moyron	0.30	237.00	INS	Analyze issues related to surety bonds, DIP credit agreement and plan.
09/20/22	T. Moyron	0.30	237.00	INS	Call with D. Oien, M. Caloway, G. Miller, et al., re surety issues.
Subtotal		0.60	474.00		

WARNACT- WARN Act Issues

Date	Timekeeper	Hours	Amount	Task	Narrative
09/07/22	T. Moyron	0.20	158.00	WARNA	Analyze emails from M. Gonzalez, et al., re L. Buckley action.
09/20/22	T. Moyron	0.20	158.00	WARNA	Call with L. Jones re WARN.
09/20/22	T. Moyron	0.50	395.00	WARNA	Zoom meeting with L. Jones, S. Alberts, et al., regarding WARN matters.
09/20/22	T. Moyron	0.40	316.00	WARNA	Analyze L. Manning, et al., emails regarding WARN.
09/20/22	T. Moyron	0.30	237.00	WARNA	Analyze matters related to WARN litigation.
09/21/22	T. Moyron	0.50	395.00	WARNA	Call with L. Manning, S. Alberts, et al., regarding WARN.

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Date	Timekeeper	Hours	Amount	Task	Narrative
09/21/22	T. Moyron	0.20	158.00	WARNA	Conference call with C. Doherty, S. Ruben, and S. Maizel re POCs re WARN.
09/21/22	T. Moyron	0.40	316.00	WARNA	Analyze POCs re WARN and litigation (.2); correspond with KCC, et al. re same (.2).
09/22/22	T. Moyron	0.20	158.00	WARNA	Analyze excel regarding WARN claims (.1); and correspond with S. Ruben re same (.1).
09/22/22	T. Moyron	0.80	632.00	WARNA	Call with D. Oien, R. Heidenreich, T. Meerovich, et al., regarding WARN matters.
09/22/22	T. Moyron	0.20	158.00	WARNA	Call with S. Maizel re WARN matters.
09/22/22	T. Moyron	0.30	237.00	WARNA	Analyze emails from S. Alberts, et al., re WARN (.2); and prepare response re same (.1).
09/22/22	T. Moyron	0.70	553.00	WARNA	Analyze and prepare answer to complaint.
09/22/22	T. Moyron	0.50	395.00	WARNA	Analyze excel chart re employee and WARN POCs (.2); correspond with S. Ruben and C. Doherty re same (.2); prepare email to FTI, et al., re WARN (.1).
09/26/22	T. Moyron	0.50	395.00	WARNA	Conference call with L. Manning, T. Meerovich, S. Maizel re WARN.
09/27/22	T. Moyron	0.80	632.00	WARNA	Call with L. Jones, S. Alberts, and S. Maizel re WARN (.3); analyze emails from WARN counsel re issues regarding document, timing, objection and reserve (.3); prepare emails to WARN counsel (.2).
09/28/22	S. McCandless	1.20	1,182.00	WARNA	Review latest version of Answer to WARN class action complaint (.30); comment on affirmative defenses (.10); provide input to M. Harriss for further consideration of wording of responses to factual allegations of complaint (.30); further communicate with S. Alberts and M. Harriss regarding responses to factual allegations and affirmative defenses and related review of same (.30); review client responses to still outstanding questions (.20).
09/28/22	T. Moyron	1.60	1,264.00	WARNA	Meeting with WARN counsel, L. Jones, and C. Montgomery (1.0) and analyze related issues re reserve and settlement (.6).
09/29/22	J. Peterson	0.50	262.50	WARNA	Review the WARN Act answer to ensure all relevant employment law affirmative defenses were included.

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Date	Timekeeper	Hours	Amount	Task	Narrative
09/30/22	R. Heidenreich	0.50	465.00	WARNA	Telephone conferences with M. Harris and S. McCandless regarding final decisions on various issues in answer to WARN Act class action complaint.
09/30/22	T. Moyron	0.80	632.00	WARNA	Analyze amended complaint (.4); analyze M. Harris, et al., emails re same (.4).
	Subtotal	11.30	9,098.50		

#### TIME AND FEE SUMMARY

<u>Timekeeper</u>	<u>Rate</u>	<u>Hours</u>	<u>Fees</u>
C. Montgomery	\$1,210.00	128.00	\$154,880.00
R. Heidenreich	\$930.00	13.10	\$12,183.00
S. Alberts	\$990.00	24.00	\$23,760.00
S. Maizel	\$970.00	73.10	\$70,907.00
T. Moyron	\$790.00	133.90	\$105,781.00
C. O'Leary	\$850.00	26.40	\$22,440.00
E. Smith	\$1,025.00	16.60	\$17,015.00
G. Miller	\$770.00	11.20	\$8,624.00
J. Murphy	\$1,045.00	2.70	\$2,821.50
L. Harrison	\$1,140.00	1.90	\$2,166.00
L. Macksoud	\$770.00	17.70	\$13,629.00
R. Williams	\$1,040.00	3.90	\$4,056.00
S. McCandless	\$985.00	45.00	\$44,325.00
J.A. Moe, II	\$760.00	12.10	\$9,196.00
L. Whidden	\$970.00	6.80	\$6,596.00
C. Doherty, Jr.	\$695.00	19.20	\$13,344.00
M. Harriss	\$455.00	19.10	\$8,690.50
S. Dhaliwal	\$780.00	9.60	\$7,488.00
D. Cook	\$620.00	52.40	\$32,488.00

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November 30, 2022

<u>Timekeeper</u>	<u>Rate</u>	<u>Hours</u>	<u>Fees</u>
E. Oliver	\$655.00	12.10	\$7,925.50
S. Schrag	\$650.00	19.90	\$12,935.00
J. Peterson	\$525.00	25.20	\$13,230.00
S. Ruben	\$525.00	9.70	\$5,092.50
E. Cobarrubias	\$350.00	0.30	\$105.00
M. Maddry	\$350.00	1.00	\$350.00
G. Medina	\$360.00	21.50	\$7,740.00
J. Milko	\$320.00	0.20	\$64.00
K.M. Howard	\$340.00	<u>4.30</u>	<u>\$1,462.00</u>
Totals		710.90	\$609,294.00

First Guaranty Mortgage Corporation  
Matter: 15810756-000003  
Invoice No.: 2581314

November 30, 2022

SUMMARY OF AMOUNT DUE BY TASK CODE

Task Code	Task Code Name	Fees
B110	Case Administration	32,310.00
B120	Asset Analysis and Recovery	3,828.00
B130	Asset Disposition	36,941.50
B140	Relief from Stay/Adequate Protection Proceedings	1,404.00
B150	Meetings of and Communications with Creditors	20,060.00
B160	Fee/Employment Applications	18,431.00
B185	Assumption/Rejection of Leases and Contracts	31,531.00
B190	Other Contested Matters (excl. assumption/rejection motions)	26,569.50
B195	Non-Working Travel	0.00
B210	Business Operations	455.00
B220	Employee Benefits/Pension	52,366.50
B230	Financing/Cash Collections	135,528.50
B240	Tax Issues	13,480.00
B260	Board of Directors Matters	13,583.00
B300	Claims and Plan	16,148.00
B310	Claims Administration and Objections	6,034.50
B320	Plan and Disclosure Statement (incl. Business Plan)	142,887.00
B400	Bankruptcy-Related Advice	7,135.00
B410	General Bankruptcy Advice/Opinions	350.00
EMP	Employee matters	40,679.00
INS	Insurance	474.00
WARNA CT	WARN Act Issues	9,098.50
	Total This Matter	\$609,294.00

DISBURSEMENT DETAIL

First Guaranty Mortgage Corporation  
Matter: 15810756-000003  
Invoice No.: 2581314

November 30, 2022

<u>Date</u>	<u>Description</u>	<u>Amount</u>
9/1/2022	Lexis MONTGOMERY\ CLAUDE	102.39
9/2/2022	Lexis MONTGOMERY\ CLAUDE	204.76
9/5/2022	Lexis MONTGOMERY\ CLAUDE	204.58
9/12/2022	Lexis MONTGOMERY\ CLAUDE	204.02
9/14/2022	Lexis MADDRY\ MICA	3.58
9/14/2022	Lexis MADDRY\ MICA	50.70
	SUBTOTAL	770.03
9/30/2022	LITIGATION SUPPORT VENDORS LITIGATION SUPPORT VENDORS INVOICE 2637538-Q3202	23.40
9/30/2022	LITIGATION SUPPORT VENDORS LITIGATION SUPPORT VENDORS INVOICE 2637538-Q3202	150.80
9/30/2022	LITIGATION SUPPORT VENDORS LITIGATION SUPPORT VENDORS INVOICE 2637538-Q3202	374.80
	SUBTOTAL	549.00
9/22/2022	Outside Professional Services Dentons Bingham Greenebaum invoice 4529545 for professional services rendered in August 2022.	1,088.00
	SUBTOTAL	1,088.00
9/16/2022	Transcript Transcript Services - Certified Transcript	10.80
	SUBTOTAL	10.80
9/21/2022	WESTLAW PETERSON\JESSICA	150.00
	SUBTOTAL	150.00
	Total Disbursements	\$2,567.83
	Total This Matter	\$611,861.83

First Guaranty Mortgage Corporation    November 30, 2022  
 Invoice #: 2581314

COMBINED TOTALS

Total Hours		710.90
Fee Total, all Matters	\$	609,294.00
Disbursement Total, all Matters	\$	2,567.83
Invoice Total, all Matters	\$	<u>611,861.83</u>

BINGHAM  
GREENEBAUMDentons Bingham Greenebaum LLP  
3913 Solutions Center  
Chicago, IL 60677-3009  
1-800-436-3644  
I.D. #61-1584266Dentons US, LLP  
Attn: Samuel Maizel  
601 S. Figueroa Street  
Suite 2500  
Los Angeles, CA 90017-5704Account No.: 136908.000002  
Invoice No.: 4529545  
Invoice Date: September 22, 2022**RESTRUCTURING****Claim Number: US15810756-000003**

FOR PROFESSIONAL SERVICES RENDERED THROUGH AUGUST 31, 2022:

DATE	ATTORNEY/ PARALEGAL	HOURS	TASK CODE	DESCRIPTION	AMOUNT
07/25/22	ACH	0.10	B110	Communication from Signature Bank enclosing DACA and review of amendments to same	64.00
08/02/22	ACH	0.10	B160	Review retention order of Dentons as entered by the court	64.00
08/01/22	ACH	0.20	B190	Communication with L. Macksoud regarding cash management order	128.00
08/05/22	ACH	0.30	B190	Review and consider communications with G. Miller regarding subtenant payment at TCB account and cash management order regarding potential for return of same	192.00
08/25/22	ACH	0.20	B190	Review and consider communications from Deutsche Bank regarding bank fees and related invoices and engage in related communications with G. Miller	128.00
08/26/22	ACH	0.60	B190	Analysis of DB's entitlement to collect bank fees in connection with review/respond to substantive communication from G. Miller	384.00
08/04/22	ACH	0.20	B210	Communications with M. Kaptain, B. Oppenheimer, and L. Macksoud regarding status of DACAs	128.00

TASK SUMMARY

TASK	TASK DESCRIPTION	HOURS	AMOUNT
B110	Case Administration	0.10	64.00
B160	Employment Applications	0.10	64.00

Dentons Bingham Greenebaum LLP

Dentons US, LLP  
136908.000002Invoice No.: 4529545  
Invoice Date: September 22, 2022  
Page 2

TASK	TASK DESCRIPTION	HOURS	AMOUNT
B190	Litigation and Contested Matters	1.30	832.00
B210	Business Operations/Strategic Planning	0.20	128.00
		1.70	1,088.00
FEES FOR PROFESSIONAL SERVICES RENDERED			\$ 1,088.00
INVOICE TOTAL (USD)			<u>\$ 1,088.00</u>

SUMMARY OF PROFESSIONAL SERVICES

ATTORNEY/PARALEGAL	HOURS	RATE	AMOUNT
Andrew C. Helman	1.70	640.00	1,088.00
	1.70		1,088.00



BINGHAM  
GREENEBAUM

Dentons Bingham Greenebaum LLP  
3913 Solutions Center  
Chicago, IL 60677-3009  
1-800-436-3644  
I.D. #61-1584266

Dentons US, LLP  
Attn: Samuel Maizel  
601 S. Figueroa Street  
Suite 2500  
Los Angeles, CA 90017-5704

Account No.: 136908.000002  
Invoice No.: 4529545  
Invoice Date: September 22, 2022

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**RESTRUCTURING**

**REMITTANCE PAGE**

INVOICE TOTAL (USD)

\$ 1,088.00

**PAYMENT IS DUE WITHIN 30 DAYS OF THE DATE OF THIS INVOICE.**

**PLEASE RETURN THIS COPY WITH YOUR PAYMENT.**



BINGHAM  
GREENEBAUM

Dentons Bingham Greenebaum LLP  
3913 Solutions Center  
Chicago, IL 60677-3009  
1-800-436-3644  
I.D. #61-1584266

**Payments by check should be sent in U.S. Dollars to:**

Dentons Bingham Greenebaum LLP  
3913 Solutions Center  
Chicago, IL 60677-3009

OR

**Payment by wire transfer/ACH should be sent in U.S. Dollars to:**

Bank Name: PNC Bank, N.A.  
249 Fifth Avenue  
Pittsburgh, PA 15222  
Account Name: Dentons Bingham Greenebaum LLP  
Account Number: 4622345343  
ABA/Routing #: Wire Transfers 041000124  
ACH Transfers 071921891  
Swift Code for International Wires: PNCCUS33

**PAYMENT IS DUE WITHIN 30 DAYS OF THE DATE OF THIS INVOICE.**

## **Dentons US LLP Fourth Monthly Fee Application**

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re:

FIRST GUARANTY MORTGAGE  
CORPORATION, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-10584 (CTG)

(Jointly Administered)

Objection Deadline: December 23, 2022, at 4:00  
p.m. (prevailing Eastern Time)

**SUMMARY OF THE FOURTH MONTHLY FEE APPLICATION OF  
DENTONS US LLP AS COUNSEL FOR THE DEBTORS AND  
DEBTORS IN POSSESSION, FOR ALLOWANCE  
OF COMPENSATION AND REIMBURSEMENT OF EXPENSES  
FOR THE PERIOD FROM OCTOBER 1, 2022 THROUGH OCTOBER 31, 2022**

General Information	
Name of Applicant:	Dentons US LLP
Authorized to Provide Services to:	Debtors and Debtors in Possession
Date of Retention:	Effective to June 30, 2022, by order signed on August 2, 2022
Period for Which Compensation and Expense Reimbursement is Sought:	October 1, 2022, through October 30, 2022
Amount of Compensation Sought as Actual, Reasonable, and Necessary:	\$938,614.00
Amount of payment sought:	\$750,891.20
Amount of Expense Reimbursement Sought As Actual, Reasonable, and Necessary:	\$4,464.58

This is a ✓ monthly                      interim      final application.

This is Dentons's fourth monthly fee application.

<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's tax identification number, are: First Guaranty Mortgage Corporation (9575); and Maverick II Holdings, LLC (5621). The location of the corporate headquarters and the service address for First Guaranty Mortgage Corporation is 5800 Tennyson Parkway, Suite 450, Plano, TX 75024.

**Prior Fee Applications filed.**

Date Filed	Period Covered	Requested Fees	Requested Expenses	Approved Fees	Approved Expenses
10/17/2022	June 30, 2022 - July 31, 2022	\$1,581,348.00	\$3,915.98	\$1,264,078.40	\$3,915.98
11/23/2022	August 1, 2022 - August 31, 2022	\$1,155,705.00	\$28,242.41	n/a	n/a
11/30/2022	September 1, 2022 - September 30, 2022	\$609,294.00	\$2,567.83	n/a	n/a

**DUS PROFESSIONALS**

Name of Professional Individual	Position of the Applicant, Year of Obtaining License to Practice, Year of Joining the Firm	Department	Hourly Billing Rate	Total Interim Hours Billed	Total Interim Compensation
Claude D. Montgomery	Partner - Admitted to the Bar in 1984; Joined the Firm in 2002	Restructuring Insolvency & Bankruptcy	\$1,210	175.30	\$212,113.00
John L. Harrington	Partner - Admitted to the Bar in 1987; Joined the Firm in 2010	Tax	\$1,175	4.40	\$5,170.00
Lynn P. Harrison, III	Partner - Admitted to the Bar in 1984; Joined the Firm in 2020	Restructuring Insolvency & Bankruptcy	\$1,140	23.00	\$26,220.00
Jeffrey J. Murphy	Partner - Admitted to the Bar in 1984; Joined the Firm in 1985	Capital Markets	\$1,045	6.10	\$6,374.00
Richard C. Williams	Partner - Admitted to the Bar in 2007; Joined the Firm in 2010	Tax	\$1,040	5.0	\$5,200.00
E. Lee Smith	Partner - Admitted to the Bar in 1986; Joined the Firm in 2003	Capital Markets	\$1,025	37.70	\$38,642.50
Sam J. Alberts	Partner - Admitted to the Bar in 1993; Joined the Firm in 2011	Restructuring Insolvency & Bankruptcy	\$990	64.60	\$63,954.00
Sandra McCandless	Partner - Admitted to the Bar in 1973; Joined the Firm in 1994	Employment & Labor	\$985	28.30	\$27,875.50
Samuel R. Maizel	Partner - Admitted to the Bar in 1985; Joined the Firm in 2015	Restructuring Insolvency & Bankruptcy	\$970	83.70	\$81,189.00
Lee P. Whidden	Partner - Admitted to the Bar in 1989; Joined the Firm in 2002	Restructuring Insolvency & Bankruptcy	\$970	4.40	\$4,268.00

<b>Name of Professional Individual</b>	<b>Position of the Applicant, Year of Obtaining License to Practice, Year of Joining the Firm</b>	<b>Department</b>	<b>Hourly Billing Rate</b>	<b>Total Interim Hours Billed</b>	<b>Total Interim Compensation</b>
Robert E. Richards	Partner - Admitted to the Bar in 1989; Joined the Firm in 1988	Restructuring Insolvency & Bankruptcy	\$940	38.60	\$36,284.00
Christopher D. O'Leary	Partner - Admitted to the Bar in 2009; Joined the Firm in 2014	Capital Markets	\$850	4.0	\$3,400.00
Tania M. Moyron	Partner - Admitted to the Bar in 2005; Joined the Firm in 2017	Restructuring Insolvency & Bankruptcy	\$790	181.70	\$143,543.00
Sanpreet Dhaliwal	Senior Managing Associate - Admitted to the Bar in 2016; Joined the Firm in 2022	Tax	\$780	7.60	\$5,928.00
Geoffrey M. Miller	Partner - Admitted to the Bar in 2012; Joined the Firm in 2014	Restructuring Insolvency & Bankruptcy	\$770	32.70	\$25,179.00
Lauren M. Macksoud	Partner - Admitted to the Bar in 2003; Joined the Firm in 2017	Restructuring Insolvency & Bankruptcy	\$770	97.60	\$75,152.00
John A. Moe, II	Partner - Admitted to the Bar in 1975; Joined the Firm in 2008	Restructuring Insolvency & Bankruptcy	\$760	14.50	\$11,020.00
Casey W. Doherty, Jr.	Senior Managing Associate - Admitted to the Bar in 2011; Joined the Firm in 2022	Restructuring Insolvency & Bankruptcy	\$695	26.40	\$18,348.00
Rebecca M. Wicks	Senior Managing Associate - Admitted to the Bar in 2016; Joined the Firm in 2021	Restructuring Insolvency & Bankruptcy	\$655	60.30	\$40,099.50
Sarah M. Schrag	Managing Associate - Admitted to the Bar in 2016; Joined the Firm in 2016	Restructuring Insolvency & Bankruptcy	\$650	21.80	\$14,170.00
David F. Cook	Managing Associate - Admitted to the Bar in 2017; Joined the Firm in 2019	Restructuring Insolvency & Bankruptcy	\$620	64.30	\$39,866.60
Pooja L. Shah	Associate - Admitted to the Bar in 2015; Joined the Firm in 2022	Commercial Litigation	\$575	9.60	\$5,520.00
Jessica Peterson	Associate - Admitted to the Bar in 2019; Joined the Firm in 2022	Employment & Labor	\$525	6.0	\$3,150.00
Samantha Ruben	Associate - Admitted to the Bar in 2019; Joined the Firm in 2021	Restructuring Insolvency & Bankruptcy	\$525	44.30	\$23,257.50
Michael E. Harriss	Senior Managing Associate - Admitted to the Bar in 2014; Joined the Firm in 2018	Commercial Litigation	\$455	35.10	\$15,970.50
George L. Medina	Senior Paralegal	Restructuring Insolvency & Bankruptcy	\$360	18.10	\$6,516.00
Kathryn Howard	Senior Paralegal	Restructuring Insolvency & Bankruptcy	\$340	0.60	\$204.00

**Grand Total: \$938,614.00**  
**Total Hours 1,095.70**  
**Blended Rate: \$856.63**

**COMPENSATION BY PROJECT CATEGORY**

<b>Task Code</b>	<b>Matter Description</b>	<b>Total Hours Billed</b>	<b>Total Fees Requested</b>
B110	Case Administration	64.30	\$52,937.50
B130	Asset Disposition	57.10	\$48,985.50
B140	Relief from Stay/Adequate Protection Proceedings	31.80	\$23,808.00
B150	Meetings of/and Communications with Creditors	6.50	\$6,119.00
B160	Fee/Employment Applications	23.60	\$13,615.00
B185	Assumption/Rejection of Leases and Contracts	50.0	\$56,976.00
B190	Other Contested Matters (excl. assumption/rejection motions)	65.20	\$54,832.50
B220	Employee Benefits/Pension	6.0	\$4,347.00
B230	Financing/Cash Collections	115.80	\$125,987.50
B240	Tax Issue	15.90	\$15,019.50
B260	Board of Directors Matters	2.50	\$2,205.50
B300	Claims and Plan	140.20	\$119,724.00
B310	Claims Administration and Objections	58.00	\$51,120.50
B320	Plan and Disclosure Statement (incl. Business Plan)	385.10	\$318,385.00
B400	Bankruptcy-Related Advice	1.10	847.00
EMP	Employee matters	36.10	\$16,955.50
INS	Insurance	1.0	\$790.00
WARNACT	Warn Act Issues	35.50	\$25,959.00
<b>Total</b>		<b>1095.70</b>	<b>\$938,614.00</b>

**EXPENSE SUMMARY**

<b>Expense Category</b>	<b>Service Provider (if applicable)</b>	<b>Total Expenses</b>
Delivery & Postage	Delivery of Hearing Binders to Sam Maizel	\$75.02
Publication Fee	Case Trackers	\$10.50
Research Fees (Lexis)	Claude D. Montgomery	\$333.24
	Tania M. Moyron	153.30
	Rebecca M. Wicks	243.50
	David Cook	48.52
Research Fees (Westlaw)	Tania M. Moyron	378.00
	Rebecca M. Wicks	2,022.50
	Jessica Peterson	75.00
	David Cook	1,125.00
<b>Total Disbursements Requested</b>		<b>\$4,464.58</b>

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FIRST GUARANTY MORTGAGE  
CORPORATION, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-10584 (CTG)

(Jointly Administered)

**Objection Deadline: December 23, 2022 at 4:00 p.m.**  
(prevailing Eastern Time)

**SUMMARY OF THE FOURTH MONTHLY FEE APPLICATION OF  
DENTONS US LLP AS COUNSEL FOR THE DEBTORS AND  
DEBTORS IN POSSESSION, FOR ALLOWANCE  
OF COMPENSATION AND REIMBURSEMENT OF EXPENSES  
FOR THE PERIOD FROM OCTOBER 1, 2022 THROUGH OCTOBER 31, 2022**

Pursuant to §§ 330 and 331 of title 11 of the United States Code (the “Bankruptcy Code”) and Rule 2016 of the Federal Rules of Bankruptcy Procedure (collectively, the “Bankruptcy Rules”), and the *Order (I) Approving Procedures for (A) Interim Compensation and Reimbursement of Expenses of Retained Professionals and (B) Expense Reimbursement for Official Committee Members and (II) Granting Related Relief* [Docket No. 268] entered on August 2, 2022 (the “Administrative Order”), Dentons US LLP (“DUS” or the “Firm”), counsel to the debtors and the debtors in possession in the above-captioned cases (the “Debtors”), hereby submits its *Fourth Monthly Application for Compensation and for Reimbursement of Expenses for the Period from October 1, 2022 through October 31, 2022* (the “Application”).

By this Application, DUS seeks a monthly interim allowance of compensation in the amount of \$938,614.00 and actual and necessary expenses in the amount of \$4,464.58 for a total allowance

<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s tax identification number, are: First Guaranty Mortgage Corporation (9575); and Maverick II Holdings, LLC (5621). The location of the corporate headquarters and the service address for First Guaranty Mortgage Corporation is 5800 Tennyson Parkway, Suite 450, Plano, TX 75024.

of \$943,078.58 and payment of \$750,891.20 (80% of the allowed fees) and reimbursement of \$4,464.58 (100% of the allowed expenses) for a total payment of \$755,355.78 for the period from October 1, 2022, through October 31, 2022 (the “Interim Period”). In support of this Application, DUS respectfully represents as follows:

### **Background**

1. On June 30, 2022 (the “Petition Date”), the Debtors filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code. The Debtors operated and managed their businesses as debtors in possession pursuant to §§ 1107(a) and 1108 of the Bankruptcy Code, and the Court confirmed the Amended Combined Disclosure Statement and Chapter 11 Plan by order entered November 2, 2022 [Docket No. 671]. No trustee or examiner has been appointed in the Debtors’ chapter 11 cases.

2. The Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2).

3. The Administrative Order authorizes certain professionals (“Professionals”) to submit monthly applications for interim compensation and reimbursement for expenses, pursuant to the procedures specified therein. The Administrative Order provides, among other things, that a Professional may submit monthly fee applications. If no objections are made within fourteen (14) days after service of the monthly fee application the Debtors are authorized to pay the Professional eighty percent (80%) of the requested fees and one hundred percent (100%) of the requested expenses. Beginning with the period ending September 30, 2022, and at three-month intervals thereafter, each of the Professionals shall file and serve an interim application for allowance of the amounts sought in its monthly fee applications for that period. All fees and expenses paid are on an interim basis until final allowance by the Court.

4. The Court approved the retention of DUS, effective as of June 30, 2022, by its *Order Authorizing and Approving the Retention of Dentons US LLP as Counsel to the debtors and debtors in possession Effective as of June 30, 2022* [Docket No. 277] (the “Retention Order”). The Retention Order authorized DUS to be compensated on an hourly basis and to be reimbursed for actual and necessary out-of-pocket expenses.

**DUS APPLICATION FOR COMPENSATION  
AND FOR REIMBURSEMENT OF EXPENSES**

5. All services for which DUS requests compensation were performed for or on behalf of the Debtors.

6. DUS has received no payment and no promises for payment from any source other than the Debtors for services rendered or to be rendered in any capacity whatsoever in connection with the matters covered by this Application. There is no agreement or understanding between DUS and any other person other than the partners of DUS for the sharing of compensation to be received for services rendered in these chapter 11 cases.

**Fee Statements**

7. The fee statement for the Interim Period is attached hereto as **Exhibit A**. This statement contains daily time logs describing the time spent by each attorney and paraprofessional during the Interim Period. To the best of DUS’ knowledge, this Application complies with §§ 330 and 331 of the Bankruptcy Code and the Bankruptcy Rules. DUS’ time reports are initially handwritten by the attorney or paralegal performing the described services. The time reports are organized daily. DUS is particularly sensitive to issues of “lumping” and unless time was spent in a one-time frame on a variety of different matters for a particular client, separate time entries are outlined in the time reports. DUS’s charges for its professional services are based upon the time,

nature, extent, and value of such services and the cost of comparable services other than in a case under the Bankruptcy Code.

#### **Actual and Necessary Expenses**

8. A summary of actual and necessary expenses incurred by DUS for the Interim Period is attached hereto as part of **Exhibit A**. DUS represents that: (i) it does not charge for internal printing; (ii) it does not charge for outgoing or incoming facsimile transmissions in bankruptcy matters; and (iii) with respect to providers of on-line legal research services (e.g., LEXIS and WESTLAW), there is no surcharge for computerized legal research.

9. DUS believes the foregoing rates are the market rates that the majority of law firms charge clients for such services. In addition, DUS believes that such charges are in accordance with the American Bar Association's ("**ABA**") guidelines, as set forth in the ABA's Statement of Principles, dated January 12, 1995, regarding billing for disbursements and other charges.

#### **Summary of Services Rendered**

10. The names of the partners and associates of DUS who have rendered professional services in these chapter 11 cases during the Interim Period, as well as the paralegals and research assistants of DUS who provided services to these attorneys during the Interim Period, are set forth in the attached **Exhibit A**.

11. DUS by and through such persons, has prepared and assisted in the preparation of various motions and orders submitted to the Court for consideration, and advised the Debtors on a regular basis with respect to various matters in connection with the Debtors' chapter 11 cases, and performed all necessary professional services which are described and narrated in detail below. DUS's efforts were extensive due to the size and complexity of the Debtors' chapter 11 cases.

### **Summary of Services by Project**

12. The services rendered by DUS during the Interim Period can be grouped into the categories set forth below. DUS attempted to place the services provided in the category that best relates to such services. However, because certain services may relate to one or more categories, services pertaining to one category may in fact be included in another category. These services, performed by categories, are generally described below, with a more detailed identification of the actual services provided set forth on the attached **Exhibit A**. **Exhibit A** identifies the attorneys and paraprofessionals who rendered services relating to each category, along with the number of hours for each individual and the total compensation sought for each category.

13. **Case Administration B110**: This category includes, but is not limited to, DUS' attention to administrative matters regarding an array of topics, including work relating to hearings and related deadlines; conference calls from parties-in-interest relating to general case matters; work relating to employee administrative issues; internal and external telephone and video conferences concerning case issues, including settlement efforts with parties-in-interest as to plan confirmation; analysis concerning schedules of assets and liabilities and statements of financial affairs; analysis concerning budget issues; analysis of and attention to qui tam litigation proceedings; analysis concerning general plan and disclosure statement issues; analysis and monitoring of a critical dates memorandum; analysis of and attention to inquiries from creditors; analysis of and attention to issues raised by the Office of the United States Trustee; analysis of and attention to issues with vendors; participation in Bankruptcy Code section 341(a) meeting of creditors; analysis of a general framework for claims review; analysis and attention to ordinary course business and professional issues; and analysis and attention to case management framework and corresponding issues.

**Fees: \$52,937.50      Hours: 64.30**

14. **Asset Disposition B130:** This category includes, but is not limited to, DUS' services related to asset sales and related issues with regard to both substance and process, including preparation of and attention to pleadings in connection therewith including a notice of successful bidding; correspondence with potential buyers and interested parties; addressing objections to the asset sales; analysis of and attention to financing issues, licensing matters; issues concerning Mass Mutual Life Insurance Company ("Mass Mutual") and STRATMOR Capital, Inc. ("Stratmor"); issues with warehouse lenders; issues relating to loan servicing; sub-servicer transfer issues; issues relating to the rights of the parties to the operating agreements; issues concerning the information demands from HUD; stalking horse bid matters; issues related to the intersection of asset sale efforts with the plan confirmation process; loan remittance issues; and sale documents.

**Fees: \$48,985.50      Hours: 57.10**

15. **Relief from Stay / Adequate Protection Proceedings B140:** This category includes, but is not limited to, DUS' work relating to relief from the automatic stay proceedings, including preparation of the opposition to the relief from stay motion filed by the qui tam plaintiff (the "Qui Tam Stay Relief Motion"), analysis of litigation related to the Qui Tam Stay Relief Motion, correspondence with the Debtor and various parties regarding the Qui Tam Stay Relief Motion and related issues, reviewing the joinder to the opposition to the Qui Tam Stay Relief Motion filed by the Committee, and analyzing the motion to relief from stay filed by Optimal Blue.

**Fees: \$23,808.00      Hours: 31.80**

16. **Meetings Of and Communications With Creditors B150:** This category includes, but is not limited to, DUS' work relating to meetings with the advisors to the Official

Committee of Unsecured Creditors concerning settlement and plan issues, meetings concerning creditor inquiries, and meetings concerning issues with warehouse lenders and other parties-in-interest.

**Fees: \$6,119.00      Hours: 6.50**

17. **Fee / Employment Applications B160:** This category includes, but is not limited to, DUS' work in connection with employment related matters, including the preparation of DUS' first and second monthly fee applications and attention to the fees of the Debtors' regulatory counsel.

**Fees: \$13,615.00      Hours: 23.60**

18. **Assumptions / Rejection Of Leases And Contracts B185:** This category includes, but is not limited to, DUS' work relating to the evaluation and analysis of the assumption/and or rejection of executory contracts and leases, work relating to the preparation and analysis of pleadings relating thereto, including preparation of a cure notice and review of the bidding procedures order in connection therewith, work relating to issues with Optimal Blue, LLC, work relating to issues concerning Mass Mutual, negotiation and preparation of a settlement with Mass Mutual, work relating to the cure objections of TIAA and Sourcepoint, negotiation and preparation of a settlement with TIAA, work relating to setoff issues in general, and work relating to servicing issues.

**Fees: \$56,976.00      Hours: 50.00**

19. **Other Contested Matters B190:** This category includes, but is not limited to, DUS' work relating to contested issues with regard to alleged WARN Act liability of the Debtors, class certification issues, employment issues, discovery issues, settlement issues concerning various parties-in-interest, False Claims Act litigation issues, and research issues, including with

regard to enforceability of a purchase option in bankruptcy. For example, DUS communicated with counsel for plaintiff in the False Claims Act litigation, reviewed discovery requests, and responded to those requests. DUS communicated with counsel for WARN Act plaintiffs, researched and analyzed Debtors' defenses to the WARN ACT, analyzed the motion for class certification, researched issues in anticipation of drafting an objection to the motion for class certification, and drafted opposition to motion for class certification. DUS also reviewed various operating agreements and conducted research on impact of bankruptcy on the enforceability purchase option clauses and conversion of LLC management rights.

**Fees: \$54,832.50      Hours: 65.20**

20. **Employee Benefits / Pension B220**: This category includes, but is not limited to, DUS' services relating to disputes concerning alleged WARN Act liability of the Debtors, analysis of and attention to class certification issues, and analysis of and attention to key employee incentive plan and key employee retention plan issues.

**Fees: \$4,347.00      Hours: 6.00**

21. **Financing / Cash Collections B230**: This category includes, but is not limited to, DUS' work relating to complex financing matters that were critical to the Debtors' successes in these chapter 11 cases. Among other things, DUS focused its attention on negotiating and resolving issues in connection with such financing, negotiating an amendment concerning such financing, and drafting a motion to approve such amendment to implement advance funding requirements under the Plan. DUS also dealt with issues stemming from the intersection of the Debtors' financing and their proposed plan structure, including issues related to a bar date motion, wind-down timing, regulatory wind-down issues, and the related budget impact of such issues. DUS provided services related to the board and lender presentation on the wind-down plan. DUS

provided services relating to disputes concerning the aforementioned financing, including analysis regarding such issues. DUS drafted a demand letter on Customers Bank and various response letters to Customers Bank and analyzed related matters. Also, in this category of service, DUS engaged in the analysis of potential settlements and related claims review and strategized regarding these issues. DUS had discussions and correspondence with FGMC, the Chief Restructuring Officer, the cash flow DIP lender, and third parties regarding the financing issues and other matters in this category. , as well as conferred with the Debtors, FTI, and other third parties on the foregoing.

**Fees: \$125,987.50      Hours: 115.80**

22. **Tax Issues B240:** This category includes, but is not limited to, DUS’ work on preservation and transfer issues related to Net Operating Loss (“NOL”), structure alternatives including researching limitations on NOLs, and analysis of and attention to the liquidating trust agreement and tax related plan matters.

**Fees: \$15,019.50      Hours: 15.90**

23. **Board of Directors Matters B260:** This category includes, but is not limited to, DUS’ work preparing for, attending, and making presentations to the Debtors’ Board of Directors concerning case issues.

**Fees: \$2,205.50      Hours: 2.50**

24. **Claims And Plan B300:** This category includes, but is not limited to, DUS’ services related to asserted claims in the False Claim Act litigation, including analysis of and attention to proofs of claim, the motion to transfer venue, reviewing indemnification and insurance issues, drafting and reviewing an objection to the proofs of claim for purposes of voting (the “Voting Objection”), analysis of the opposition to the Voting Objection, drafting a reply in support

of the Voting Objection, and analyzing and researching related issues. DUS also provided services relating to claims filed against the Debtors' estates, including analysis of general unsecured claims, priority claims, and administrative expense claims; analysis of various Plan reserves and related issues; review and analysis of proofs of claim; creditor claim negotiations; and internal and external conferences concerning filed claims with the Debtors and third parties. DUS additionally provided significant services related preparation and confirmation of the Plan, including drafting the amended Plan, the confirmation order, and other pleadings and documents; preparation and extensive revisions of the brief in support of plan confirmation and supporting declaration; services relating to WARN Act issues in connection with the Plan and the brief in support of confirmation; services relating to Freddie Mac issues in connection with the brief in support of confirmation; services relating to claim objections; services relating to plan settlement term sheets with parties-in-interest; analysis of proposed plan amendments; research in preparation for confirmation hearing; and attendance and participation in plan confirmation hearing and settlement negotiations with the Debtors and various third parties.

**Fees: \$119,724.00    Hours: 140.20**

25.    **Claims Administration And Objections B310:** This category includes, but is not limited to, DUS' work relating to analyzing and evaluating claims concerning, among other things, False Claim Act litigation, defective correspondent loans, cure issues, administrative expenses, real property issues, and employment issues. DUS provided services relating to significant correspondence with various claimants relating to various issues and concerns impacting individual claims against the Debtors' estates. DUS drafted stipulations related to cure amounts and engaged in negotiations relating to various claim disputes. This category also includes DUS' work relating to the preparation of estimation pleadings, and attention to bar date issues.

**Fees: \$51,120.50      Hours: 58.00**

26. **Plan And Disclosure Statement B320:** This category includes, but is not limited to, DUS' services relating to conferences and correspondence with the Debtors, the Chief Restructuring Officer, the cash flow DIP lender, and other third parties regarding the disclosure statement and plan , timing, and related pleadings and matters. DUS's services included the preparation and analysis of the proposed plan and disclosure statement; preparation of a plan supplement and memorandum in support of plan confirmation, including the preparation of replies therein to all objections to the plan and related research; analysis of claim classification and other related matters; consideration of distributions and implementation of plan; consideration of state licenses; analysis of comments to plan, order and other documents; analysis and preparation of plan language to address concerns of parties-in-interest including WARN Act claimants, agencies, lenders, and others; communications and negotiations with Official Committee of Unsecured Creditors and other third parties regarding global settlement; incorporation of the global settlement into the plan; negotiations with plan objectors regarding settlements and incorporation of settlements into the plan; analysis concerning wind-down issues, including with respect to necessary funding and reporting obligations; analysis concerning notices of non-voting; analysis relating to release language in the plan; analysis with respect to budget and liquidating trust; analysis with respect to retained causes of action; and participation in plan confirmation hearing and related settlement conferences.

**Fees: \$318,385.00      Hours: 385.10**

27. **Bankruptcy Related Advice B400:** This category includes, but is not limited to, DUS' work relating to general bankruptcy advice, including with regard to title litigation and payment on certain invoices.

**Fees: \$847.00      Hours: 1.10**

28. **Employee Matters EMP:** This category includes, but is not limited to, DUS' services relating to various employment matters, including in connection with alleged WARN Act liability of the Debtors, class certification issues, as well as employment matters more generally. DUS engaged in calls and correspondence with plaintiffs' counsel in the WARN Act litigation. DUS provided services relating to the objection of the motion for class certification in the WARN Act litigation, including researching issues related to class certification and Federal Rule of Civil Procedure 23 and drafting and revising the opposition to the motion for class certification.

**Fees: \$16,955.50      Hours: 36.10**

29. **Insurance INS:** This category includes, but is not limited to, DUS' work relating to insurance policies.

**Fees: \$790.00      Hours: 1.00**

30. **WARN ACT:** This category includes, but is not limited to, DUS' services relating to WARN Act litigation, including issues concerning defenses and class certification. DUS analyzed various issues related to the WARN Act litigation, including the proofs of claim filed by the Debtors' former employees; defenses to WARN Act liability such as the liquidating fiduciary exception, unforeseen business circumstances exception, and the faltering company exception; and federal regulations related to the WARN Act. DUS drafted and revised an opposition to the motion for class certification in the WARN Act litigation. DUS also analyzed and prepared various sections to address the the objections to confirmation by the WARN Act claimants in the confirmation brief.

**Fees: \$25,959.00      Hours: 35.50**

### DUS PROFESSIONALS

31. Attorneys and paraprofessionals of DUS expended a total of 1,095.70 hours in connection with their representation of the Debtors during the Interim Period, as follows:

<b>Name of Professional Individual</b>	<b>Position of the Applicant, Year of Obtaining License to Practice, Year of Joining the Firm</b>	<b>Department</b>	<b>Hourly Billing Rate</b>	<b>Total Interim Hours Billed</b>	<b>Total Interim Compensation</b>
Claude D. Montgomery	Partner - Admitted to the Bar in 1984; Joined the Firm in 2002	Restructuring Insolvency & Bankruptcy	\$1,210	175.30	\$212,113.00
John L. Harrington	Partner - Admitted to the Bar in 1987; Joined the Firm in 2010	Tax	\$1,175	4.40	\$5,170.00
Lynn P. Harrison, III	Partner - Admitted to the Bar in 1984; Joined the Firm in 2020	Restructuring Insolvency & Bankruptcy	\$1,140	23.00	\$26,220.00
Jeffrey J. Murphy	Partner - Admitted to the Bar in 1984; Joined the Firm in 1985	Capital Markets	\$1,045	6.10	\$6,374.00
Richard C. Williams	Partner - Admitted to the Bar in 2007; Joined the Firm in 2010	Tax	\$1,040	5.0	\$5,200.00
E. Lee Smith	Partner - Admitted to the Bar in 1986; Joined the Firm in 2003	Capital Markets	\$1,025	37.70	\$38,642.50
Sam J. Alberts	Partner - Admitted to the Bar in 1993; Joined the Firm in 2011	Restructuring Insolvency & Bankruptcy	\$990	64.60	\$63,954.00
Sandra McCandless	Partner - Admitted to the Bar in 1973; Joined the Firm in 1994	Employment & Labor	\$985	28.30	\$27,875.50
Samuel R. Maizel	Partner - Admitted to the Bar in 1985; Joined the Firm in 2015	Restructuring Insolvency & Bankruptcy	\$970	83.70	\$81,189.00
Lee P. Whidden	Partner - Admitted to the Bar in 1989; Joined the Firm in 2002	Restructuring Insolvency & Bankruptcy	\$970	4.40	\$4,268.00
Robert E. Richards	Partner - Admitted to the Bar in 1989; Joined the Firm in 1988	Restructuring Insolvency & Bankruptcy	\$940	38.60	\$36,284.00
Christopher D. O'Leary	Partner - Admitted to the Bar in 2009; Joined the Firm in 2014	Capital Markets	\$850	4.0	\$3,400.00
Tania M. Moyron	Partner - Admitted to the Bar in 2005; Joined the Firm in 2017	Restructuring Insolvency & Bankruptcy	\$790	181.70	\$143,543.00
Sanpreet Dhaliwal	Senior Managing Associate - Admitted to the Bar in 2016; Joined the Firm in 2022	Tax	\$780	7.60	\$5,928.00
Geoffrey M. Miller	Partner - Admitted to the Bar in 2012; Joined the Firm in 2014	Restructuring Insolvency & Bankruptcy	\$770	32.70	\$25,179.00

Name of Professional Individual	Position of the Applicant, Year of Obtaining License to Practice, Year of Joining the Firm	Department	Hourly Billing Rate	Total Interim Hours Billed	Total Interim Compensation
Lauren M. Macksoud	Partner - Admitted to the Bar in 2003; Joined the Firm in 2017	Restructuring Insolvency & Bankruptcy	\$770	97.60	\$75,152.00
John A. Moe, II	Partner - Admitted to the Bar in 1975; Joined the Firm in 2008	Restructuring Insolvency & Bankruptcy	\$760	14.50	\$11,020.00
Casey W. Doherty, Jr.	Senior Managing Associate - Admitted to the Bar in 2011; Joined the Firm in 2022	Restructuring Insolvency & Bankruptcy	\$695	26.40	\$18,348.00
Rebecca M. Wicks	Senior Managing Associate - Admitted to the Bar in 2016; Joined the Firm in 2021	Restructuring Insolvency & Bankruptcy	\$655	60.30	\$40,099.50
Sarah M. Schrag	Managing Associate - Admitted to the Bar in 2016; Joined the Firm in 2016	Restructuring Insolvency & Bankruptcy	\$650	21.80	\$14,170.00
David F. Cook	Managing Associate - Admitted to the Bar in 2017; Joined the Firm in 2019	Restructuring Insolvency & Bankruptcy	\$620	64.30	\$39,866.60
Pooja L. Shah	Associate - Admitted to the Bar in 2015 Joined the Firm in 2022	Commercial Litigation	\$575	9.60	\$5,520.00
Jessica Peterson	Associate - Admitted to the Bar in 2019; Joined the Firm in 2022	Employment & Labor	\$525	6.0	\$3,150.00
Samantha Ruben	Associate - Admitted to the Bar in 2019; Joined the Firm in 2021	Restructuring Insolvency & Bankruptcy	\$525	44.30	\$23,257.50
Michael E. Harriss	Senior Managing Associate - Admitted to the Bar in 2014; Joined the Firm in 2018	Commercial Litigation	\$455	35.10	\$15,970.50
George L. Medina	Senior Paralegal	Restructuring Insolvency & Bankruptcy	\$360	18.10	\$6,516.00
Kathryn Howard	Senior Paralegal	Restructuring Insolvency & Bankruptcy	\$340	0.60	\$204.00

32. The nature of services performed by these persons is fully set forth in **Exhibit A** attached hereto. The rates reflect DUS's normal hourly rates for work of this character. The reasonable value of the services rendered by DUS for the Debtors during the Interim Period is \$609,294.00.

33. In accordance with the factors enumerated in § 330 of the Bankruptcy Code, it is respectfully submitted that the amount requested by DUS is fair and reasonable given (a) the

complexity of these chapter 11 cases, (b) the time expended, (c) the nature and extent of the services rendered, (d) the value of such services, and (e) the costs of comparable services other than in a case under the Bankruptcy Code. Moreover, DUS has reviewed the requirements of Del. Bankr. LR 2016-2 and the Administrative Order and believes that this Application complies with such Rule and Order.

WHEREFORE, DUS respectfully requests that the Court enter an order providing that, for the period from October 1, 2022 through October 30, 2022, an interim allowance be made to DUS for compensation in the amount of \$938,614.00 and actual and necessary expenses in the amount of \$4,464.58 for a total allowance of \$943,078.58 and payment of \$750,891.20 (80% of the allowed fees) and reimbursement of \$4,464.58 (100% of the allowed expenses) be authorized for a total payment of \$755,355.78; and for such other and further relief as this Court deems proper.

Dated: December 2, 2022  
Wilmington, Delaware

**PACHULSKI STANG ZIEHL & JONES LLP**

/s/ Mary F. Caloway  
Laura Davis Jones (DE Bar No. 2436)  
Timothy P. Cairns (DE Bar No. 4228)  
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-and-

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Tania M. Moyron (admitted *pro hac vice*)

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*Counsel for Debtors and Debtors in Possession*

**DECLARATION**

STATE OF CALIFORNIA           )  
                                                  ) ss.  
COUNTY OF LOS ANGELES    )

I, Samuel M. Maizel, hereby certify as follows:

1. I am a partner in the applicant firm, Dentons US LLP (“DUS”), and have been admitted to appear before this Court *pro hac vice*.

2. I have personally performed many of the legal services rendered by DUS, as counsel for the Debtors, and am thoroughly familiar with all other work performed on behalf of the Debtors by the lawyers and paraprofessionals in the firm.

3. The facts set forth in the foregoing Application are true and correct to the best of my knowledge, information, and belief. Moreover, I have reviewed the requirements of Rule 2016-2 of the Local Rules of Practice and Procedure of the United States Bankruptcy Court for the District of Delaware and submit that the Application complies with such requirements.

Dated: December 1, 2022

/s/ Samuel M. Maizel  
/s/ Samuel M. Maizel

**EXHIBIT A**

Fees

First Guaranty Mortgage Corporation  
Attn: Aaron Samples  
5800 Tennyson Parkway, Suite 450  
Plano TX 75024  
United States

November 30, 2022

Invoice No. 2582981

Client: 15810756

Payment Due Upon Receipt

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Total This Invoice

\$ 943,078.58

Please return this page with your payment

In the case of mail deliveries to:

SNR Denton US LLP  
8000 Sears Tower  
Chicago, IL 60606

OR

In the case of overnight deliveries to:

SNR Denton US LLP  
Attention: Accounting  
233 South Wacker Drive  
Chicago, IL 60604-6404

Payment by wire transfer/ACH should be sent to:

Citi Private Bank  
227 W Monroe, Chicago, IL 60606  
ABA Transit # 271070801  
Account # 0801051693  
Account Name: Dentons US LLP  
Swift Code: CITIUS33

Reference Invoice # and/or client matter #

All payments must be in U.S. Dollars - Federal Tax I.D. Number 36-1796730

Questions relating to this invoice should be directed to:

S. Maizel  
at 1 213 623 9300

First Guaranty Mortgage Corporation  
Attn: Aaron Samples  
5800 Tennyson Parkway, Suite 450  
Plano TX 75024  
United States

November 30, 2022

Invoice No. 2582981

For Professional Services Rendered through October 31, 2022:

Matter: 15810756-000003  
First Guaranty Mortgage Corporation

B110 - Case Administration

Date	Timekeeper	Hours	Amount	Task	Narrative
10/03/22	S. Schrag	0.10	65.00	B110	Review correspondence from M. Hyland of FTI regarding retention agreement terms for KCC and respond.
10/03/22	S. Schrag	0.20	130.00	B110	Review voicemail from potential creditor (Performance Autocare) regarding notice of bankruptcy (.1); confer with T. Moyron regarding the same (.1).
10/03/22	T. Moyron	0.20	158.00	B110	Recurring call with D. Oien, J. John, S. Schrag, et al. re pending matters, including pending lawsuits.
10/03/22	C. Doherty, Jr.	0.10	69.50	B110	Attention to returned filing regarding notice of bankruptcy in Texas case.
10/03/22	L. Macksoud	1.70	1,309.00	B110	Call with FGMC and Dentons working group to discuss priority items list (.6), confer with J. John and Multibank re outstanding wire (.4), review email from US Trustee and confer with FTI to coordinate response re same (.5), draft email to counsel to Planet Home re holdback issue (.2).
10/03/22	C. Montgomery	0.60	726.00	B110	Priority items call with A. Samples, T. Meerovich, L. Lacksoud, L. Manning (.6).
10/04/22	L. Macksoud	1.40	1,078.00	B110	Priority matters call with FTI and company (.5), call with counsel to Planet Home to discuss claim reconciliations (.4) draft follow up email to FGMC re same (.1), calls and emails with FGMC and Multibank re outstanding wire (.4).

First Guaranty Mortgage Corporation  
Matter: 15810756-000003  
Invoice No.: 2582981

November 30, 2022

Date	Timekeeper	Hours	Amount	Task	Narrative
10/04/22	S. Schrag	0.60	390.00	B110	Confer with OCPs regarding declarations (.4); confer with T. Moyron and S. Maizel regarding Buckley's potential for additional filings regarding OCP expenses (.1); confer with T. Cairns regarding filing OCP declarations (.1).
10/04/22	S. Maizel	0.50	485.00	B110	Zoom conference with FTI, D. Oien, A. Samples, etc. re priority issues to resolve.
10/05/22	S. Schrag	0.70	455.00	B110	Review OCP Order (.3); confer with T. Moyron regarding the same (.2); confer with A. Louis regarding OCP procedures and potential fee application (.2).
10/05/22	G. Miller	0.30	231.00	B110	Call with J. John re amendments to schedules (.2); Email T. Moyron re same (.1).
10/05/22	T. Moyron	0.60	474.00	B110	Correspondence regarding pending issues with C. Montgomery, et al.
10/06/22	T. Moyron	1.20	948.00	B110	Correspondence regarding pending issues with FTI, Reed Smith, et al.
10/06/22	C. Doherty, Jr.	0.30	208.50	B110	Review plan and disclosure statement filed with Court to stay appraised re employee issues and strategy.
10/06/22	L. Macksoud	1.10	847.00	B110	Participate in priority issues call with Dentons, FGMC and FTI working groups.
10/06/22	S. Maizel	0.60	582.00	B110	Telephone conference with M. Schwarzmann, N. Peterman, etc. re budget and plan confirmation issues.
10/06/22	S. Maizel	0.90	873.00	B110	Telephone conference with D. Oien, T. Meerovich, etc. re priority pending issues.
10/06/22	S. Schrag	0.60	390.00	B110	Review correspondence from M. Hyland regarding KCC invoices (.1); review KCC fee application (.1); confer with M. Hyland regarding KCC invoices (.1); review the same (.2); confer with T. Moyron and S. Maizel regarding the same (.1).
10/06/22	S. Schrag	0.40	260.00	B110	Review correspondence from S. Alberts regarding service (.1); review notice (.1); confer with S. Alberts regarding the same (.1); confer with KCC regarding the same (.1).

First Guaranty Mortgage Corporation  
Matter: 15810756-000003  
Invoice No.: 2582981

November 30, 2022

Date	Timekeeper	Hours	Amount	Task	Narrative
10/07/22	S. Maizel	0.20	194.00	B110	Zoom conference re recurring legal issues with J. Johns, D. Oien, etc.
10/07/22	L. Macksoud	1.50	1,155.00	B110	Review information provided by FTI on schedule B and draft response to questions provided by US Trustee re same (.6), confer with C. Milenkevich in real estate to discuss quiet title action (.2) and draft email to plaintiff's counsel re same (.2), call with C. Montgomery to discuss TIAA adversary proceeding and motion and discuss filings necessary for same (.5).
10/07/22	G. Miller	0.30	231.00	B110	Review proposed amendments to schedules and statements and email T. Moyron re same.
10/07/22	S. Schrag	0.20	130.00	B110	Confer with A. Estrada regarding service (.1); confer with S. Alberts regarding the same (.1).
10/07/22	T. Moyron	0.20	158.00	B110	Conference call with J. John, S. Schrag, et al., re re-occurring issues and questions, including various claims.
10/07/22	T. Moyron	0.80	632.00	B110	Correspondence with C. Doherty, M. Caloway, et al. regarding pending issues.
10/08/22	S. Schrag	0.10	65.00	B110	Review voicemail from potential creditor and confer with T. Moyron regarding the same.
10/08/22	S. Alberts	0.20	198.00	B110	Communication from FTO about waiver and release (.1) and follow up (.1).
10/08/22	S. Maizel	0.50	485.00	B110	Review and respond to emails re pending issues.
10/10/22	C. Montgomery	1.30	1,573.00	B110	Participation in FTI priority items review via teams including T. Meerovich, L. Manning, A. Samples and T. Moyron (1.3).
10/10/22	G. Miller	1.00	770.00	B110	Review Kari Crutcher motion for stay relief.
10/10/22	L. Macksoud	3.20	2,464.00	B110	Participate in priority items call with working group (1.3), confer with T. Moyron re various plan related work streams (.2), review plan and draft assessment of timeline for effective date (1.1), draft assessment for Liquidating Trust requirements (.6).

First Guaranty Mortgage Corporation  
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Invoice No.: 2582981

November 30, 2022

Date	Timekeeper	Hours	Amount	Task	Narrative
10/10/22	T. Moyron	0.60	474.00	B110	Correspondence with FTI, R. Richards, et al. regarding pending issues.
10/11/22	L. Macksoud	5.90	4,543.00	B110	Call with counsel to Mass Mutual on issues relating to MLPA and servicing agreements (.5), follow up with C. Montgomery and T. Moyron re same (.2), draft and finalize memos on time line for effective date, strategy to create liquidating trust and outline of post confirmation budget issues (2.3), call with T. Moyron and C. Montgomery to discuss same (1.1), confer with C. Montgomery re same (.2), review background emails and correspondence re TIAA and review motion to compel assumption or rejection filed by same (.8), draft letter to TIAA re same (.6) and confer with C. Montgomery re same (.2).
10/11/22	S. Schrag	0.10	65.00	B110	Review critical dates memorandum.
10/11/22	S. Schrag	0.40	260.00	B110	Conduct research regarding North Carolina Housing Finance regarding Notice of Bankruptcy question (.2); confer with J. Wolcott of the same regarding the same (.1); confer with T. Moyron regarding the same (.1).
10/11/22	S. Schrag	0.50	325.00	B110	Conduct research regarding Interim Order (.3); confer with M. Proctor regarding procedures related to the same (.2).
10/11/22	G. Miller	1.00	770.00	B110	Call with S. Maize1, T. Cairns, L. Davis Jones and T. Moyron re motion to lift stay re qui tam action.
10/12/22	L. Macksoud	4.50	3,465.00	B110	Participate in priority items call with working group (1.1), review previous correspondence and participate in call with Mass Mutual re servicing agreements (.8), call with T. Moyron and C. Montgomery re liquidating trust issues and timing for effective date (.9), draft objection to TIAA motion (1.7).
10/12/22	S. Maize1	1.10	1,067.00	B110	Zoom conference with T. Meerovich, etc. re priority issues.
10/12/22	S. Maize1	0.10	97.00	B110	Telephone conference with J. Johns re recurring legal issues.

First Guaranty Mortgage Corporation  
Matter: 15810756-000003  
Invoice No.: 2582981

November 30, 2022

Date	Timekeeper	Hours	Amount	Task	Narrative
10/12/22	T. Moyron	0.60	474.00	B110	Correspondence with J. John, C. O'Leary, et al. regarding pending issues.
10/13/22	L. Macksoud	2.60	2,002.00	B110	Further draft objection to TIAA Motion (.4) and review TIAA Adversary Proceeding docket (.3), draft email to C. Montgomery re same (.1), confer with T. Cairns re quiet title actions (.2), review draft liquidating trust agreement provided by PSZJ (.4), call with G. Miller to discuss confirmation brief and declaration (.2), confer with C. Montgomery re TIAA letter (.2), confer with company re claim analysis and further revise same (.5), call with T. Moyron and J. John to discuss plan supplement and retained causes of action (.3).
10/13/22	G. Miller	0.20	154.00	B110	Call with S. Ruben re confirmation brief.
10/14/22	S. Schrag	0.50	325.00	B110	Confer with A. Louis regarding procedures related to ordinary course professionals (.3); confer with T. Moyron regarding ordinary course professionals (.1); conduct research regarding the same (.1).
10/14/22	T. Moyron	0.60	474.00	B110	Correspondence with L. Jones, T. Cairns, J. John, et al. regarding pending issues.
10/16/22	T. Moyron	4.50	3,555.00	B110	Correspondence with "with T. Ofak, M. Caloway, FTI, et al., regarding Qui Tam and related issues (.7); analyze related issues, documents, cases and objection re Qui Tam (3.8).
10/16/22	C. Doherty, Jr.	1.20	834.00	B110	Prepare insert regarding qui tam issues for confirmation reply (1.0); call with T. Moyron regarding same (.2).
10/17/22	S. Schrag	0.20	130.00	B110	Confer with D. Maddux regarding ordinary course professional declaration (.1); confer with M. Caloway and T. Cairns regarding the same (.1).
10/18/22	G. Miller	0.40	308.00	B110	Review correspondence re Iron Mountain contract and email J. John and M. Jacobsen re same (.2); Emails with J. Price re same (.2).
10/19/22	T. Moyron	0.60	474.00	B110	Correspondence with T. Cairns, M. Power, N. Peterman, et al., regarding ballots and other matters.

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Date	Timekeeper	Hours	Amount	Task	Narrative
10/19/22	S. Maizel	0.10	97.00	B110	Telephone conference with T. Moyron re pending issues.
10/19/22	S. Maizel	0.30	291.00	B110	Telephone conference with J. Jones, etc. re recurring legal issues.
10/20/22	T. Moyron	0.60	474.00	B110	Correspondence with L. Macksoud, D. Oien, FTI, et al., regarding Planet, FirstLine, wind-down matters, etc.
10/24/22	C. Montgomery	0.80	968.00	B110	Priority items call with T. Meetovich, T. Moyron and others (.8).
10/24/22	J. Murphy	0.50	522.50	B110	Email C. Montgomery; review files for Massachusetts Mutual MLPA.
10/24/22	S. Maizel	0.50	485.00	B110	Participate in continued 341(a) meeting held by US Trustee.
10/24/22	S. Maizel	0.50	485.00	B110	Participate in conference call re priority issues with FTI, A. Samples, etc.
10/24/22	S. Schrag	0.10	65.00	B110	Review ordinary course professionals material.
10/25/22	S. Alberts	0.10	99.00	B110	Receive, review and forward communication from PBGC to T. Moyron.
10/25/22	S. Maizel	0.50	485.00	B110	Telephone conference with A. Samples, etc. re Ginnie Mae issues.
10/26/22	G. Miller	0.30	231.00	B110	Review sale transaction with respect to FirstLine Title and email R. Richards re same.
10/26/22	G. Miller	0.70	539.00	B110	Review proposed Freddie Mac insert re confirmation order and email R. Richards re same.
10/26/22	T. Moyron	0.40	316.00	B110	Correspondence with N. Peterman regarding Solidifi; confer with D. Cook, et al., re releases and analyze related issues.
10/26/22	T. Moyron	0.40	316.00	B110	Re-occurring call for questions with D. Oien, et al., regarding JV Interest and other matters.
10/26/22	T. Moyron	0.50	395.00	B110	Conference call with C. Baur, J. Kearney, Greenway, et al., regarding billing and other matters.
10/26/22	S. Schrag	0.10	65.00	B110	Confer with S. Butler regarding proof of claim.

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Date	Timekeeper	Hours	Amount	Task	Narrative
10/26/22	S. Schrag	0.20	130.00	B110	Confer with V. Tyler regarding question about notice of bankruptcy (.1); confer with T. Moyron regarding the same (.1).
10/26/22	G. Medina	0.30	108.00	B110	Received, reviewed and send Critical Dates memo received and send to docketing to calendar.
10/26/22	S. Maizel	0.40	388.00	B110	Zoom conference with D. Oien, etc. re recurring legal issues.
10/27/22	G. Medina	0.60	216.00	B110	Correspond with S. Alberts and send first day declaration of A. Samples (0.2); further review and send word version of Declaration to S. Alberts, M. Harriss and C. Doherty (0.4).
10/27/22	G. Miller	3.30	2,541.00	B110	Review Fannie Mae limited objection and draft response to the same.
10/27/22	J. Murphy	4.30	4,493.50	B110	Draft claim settlement agreements.
10/28/22	J. Murphy	1.30	1,358.50	B110	Attention to emails regarding settlement term sheets and proofs of claim.
10/28/22	C. Montgomery	0.20	242.00	B110	Participate in priority items call with T. Meerovich and A. Samples (.20).
10/31/22	S. Maizel	0.10	97.00	B110	Telephone conference with M. Schwarzmman re pending issues.
	Subtotal	64.30	52,937.50		

B130 - Asset Disposition

Date	Timekeeper	Hours	Amount	Task	Narrative
10/01/22	G. Miller	0.90	693.00	B130	Review and revise CIM re 363 sale (.8); emails with C. Montgomery re same (.1).
10/02/22	G. Miller	1.90	1,463.00	B130	Review and revise CIM re 363 sale.
10/02/22	L. Macksoud	0.60	462.00	B130	Call with C. Montgomery to discuss time frame for Customer's Bank asset sale (.2), review prior email exchanges with counsel on same (.3), emails with compliance officer from Multibank on outstanding wire transfer (.1).
10/03/22	G. Miller	0.40	308.00	B130	Call with G.Graham re revisions to CIM presentation.

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Date	Timekeeper	Hours	Amount	Task	Narrative
10/03/22	E. Smith	0.70	717.50	B130	Reviewed correspondence regarding warehouse provider claims and counterclaims (.4); reviewed correspondence with counsel for subservicer and counsel for warehouse provider seeking redirection of remittances directly to warehouse provider, as instructed by FGMC (.3).
10/03/22	C. Montgomery	0.80	968.00	B130	Communications with P. Siddiqui regarding transfer of JVB mortgage servicing files to Planet Home (.1); communications with T. Moyron and T. Meerovich regarding UST inquiries regarding JVB and TCB repo facilities (.1); review CIM prepared for Stratmor and communications with T. Moyron regarding same (.3); communications with G. Miller regarding same and source of modification (.3).
10/04/22	G. Miller	4.60	3,542.00	B130	Review Operating Agreement and research legal issues concerning right of RM Title to acquire interest in JV (4.0); Email T. Moyron, S. Maizel and C. Montgomery re same (.6).
10/05/22	T. Moyron	0.40	316.00	B130	Conference call with Stratmore, L. Manning, A. Samples et al., re sales process and analyze follow up emails from Stratmore re potential buyers.
10/05/22	C. Montgomery	1.70	2,057.00	B130	Communications with J. Webeucker and G. Reyes regarding JLWA purchased loans and HUD information demand (.2); communications with T. Moyron and O. Alaniz regarding reference to a Freddie Mac in asset list and Fannie Mae request to Acknowledge Lender Contract termination (1.5).
10/07/22	C. Montgomery	0.50	605.00	B130	Teams call with T. Meerovich, D Oien, T. Moyron regarding Stratmor asset sale and Fannie Mae position on license sale (.5).
10/07/22	T. Moyron	0.70	553.00	B130	Zoom meeting regarding Freddie and FNMA re sale.
10/07/22	T. Moyron	0.50	395.00	B130	Conference call with Stratmore, A. Samples, T. Meerovich, S. Maizel re interest and sale process.

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Date	Timekeeper	Hours	Amount	Task	Narrative
10/07/22	S. Maizel	0.50	485.00	B130	Zoom conference with Stratmor, etc. re sale issues.
10/10/22	T. Moyron	0.30	237.00	B130	Call with Stratmor, A. Samples, T. Meerovich, et al., re sale updates.
10/10/22	S. Maizel	0.30	291.00	B130	Zoom conference with A. Samples, D. Oien, Stratmor, etc. re sale efforts.
10/11/22	T. Moyron	1.40	1,106.00	B130	Call with Stratmore, T. Meerovich, A. Samples, et al., re stalking horse bid, related considerations, potential costs and issues, and next steps.
10/11/22	T. Moyron	0.30	237.00	B130	Call with G. Graham, et al., with potential buyer regarding various questions.
10/11/22	T. Moyron	1.30	1,027.00	B130	Teams meeting with Stratmor, FTI, Buckley, A. Samples, S. Maizel, et al. re sale process, stalking-horse bid, potential costs and inquiries related to potential next steps.
10/11/22	T. Moyron	0.20	158.00	B130	Call with S. Maizel re sale process and related issues.
10/11/22	E. Smith	0.40	410.00	B130	Confer with Glenda Reyes regarding process for transfer of servicing from SLS upon sale of GNMA loans in Click N Close trade (.2); review and prepare correspondence with subservicer's counsel regarding subservicing transfer process (.2).
10/11/22	S. Schrag	0.10	65.00	B130	Confer with L. Macksoud regarding defective correspondent loans.
10/11/22	S. Maizel	1.40	1,358.00	B130	Call with Stratmore, T. Meerovich, A. Samples, et al., re stalking horse bid, related considerations, potential costs and issues, and next steps.
10/11/22	S. Maizel	0.70	679.00	B130	Zoom conference with Mortgage Advisory, etc. re potential buyer regarding various questions. (.4); telephone conference with Greenberg Trauig re same (.3).
10/11/22	S. Maizel	1.30	1,261.00	B130	Teams meeting with Stratmor, FTI, Buckley, A. Samples, T. Moyron, etc. re sale process, stalking-horse bid, potential costs and inquiries related to potential next steps.

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Date	Timekeeper	Hours	Amount	Task	Narrative
10/11/22	S. Maizel	0.20	194.00	B130	Call with T. Moyron re sale process and related issues.
10/12/22	S. Maizel	0.40	388.00	B130	Telephone conference with Stratmor re sale issues.
10/12/22	T. Moyron	0.50	395.00	B130	Analyze sale related issues.
10/12/22	T. Moyron	0.40	316.00	B130	Conference call with Stratmore, T. Meerovich, A. Samples, regarding sale process.
10/13/22	S. Maizel	0.90	873.00	B130	Zoom conference with J. Weber, Paul Weiss attorneys, etc. re Maverick sale issues (.5); email to J. Weber re same (.4).
10/13/22	S. Maizel	0.50	485.00	B130	Review and revise memo re sale of state MOL under section 363.
10/14/22	D. Cook	0.10	62.00	B130	Email communication with T Moyron regarding bid procedures order.
10/14/22	S. Maizel	0.50	485.00	B130	Telephone conference with Stratmor, etc. re sale of remaining assets.
10/16/22	L. Macksoud	0.60	462.00	B130	Call with working group re upcoming asset sales.
10/17/22	L. Macksoud	4.60	3,542.00	B130	Review wind-down work plan and supplement with additional items (.4), participate in asset recovery call with working group (1.4), draft declaration of T. Meerovich in support of plan confirmation (2.8).
10/17/22	T. Moyron	0.80	632.00	B130	Conference call with Stratmor, FTI, S. Maizel, et al., regarding sale process.
10/17/22	S. Maizel	0.80	776.00	B130	Zoom conference with Stratmor, etc. re sale of remaining assets.
10/19/22	T. Moyron	0.30	237.00	B130	Call with Stratmor, T. Meerovich, et al., re sale update.
10/19/22	S. Maizel	0.40	388.00	B130	Zoom conference with Stratmor re sale issues.
10/20/22	T. Moyron	0.70	553.00	B130	Analyze emails from Stratmor, et al., regarding sale and bidding requirements and requests (.4) and respond to same (.1); analyze matters related to FNMA objection (.2).

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Date	Timekeeper	Hours	Amount	Task	Narrative
10/20/22	T. Moyron	0.60	474.00	B130	Analyze two offers received and related emails.
10/20/22	T. Moyron	0.30	237.00	B130	Call with Stratmor, T. Meerovich, A. Samples, et al. re sale outcome.
10/20/22	C. Montgomery	0.40	484.00	B130	Phone call with L. Manning regarding possible DIP Lender credit bid for Licenses and IP (.2); review Freddie Mac objection to sale (.2).
10/21/22	C. Montgomery	0.40	484.00	B130	Communications with G. Miller regarding Deutsche Bank stipulation (.2); communications with L. Smith regarding Click & Clise loan sales (.2).
10/21/22	S. Maizel	0.70	679.00	B130	Zoom conference with Stratmor, etc. re sale issues.
10/21/22	T. Moyron	1.40	1,106.00	B130	Analyze bids (.2); conference call with T. Cairns (.3); analyze email from T. Cairns re next steps (.1), respond re same (.1); analyze related issues (.2); conference call with Stratmor, A. Samples, T. Meerovich, S. Maizel, et al. re bids, sale process and next steps (.5).
10/21/22	E. Smith	1.10	1,127.50	B130	Reviewed correspondence and conferred with Glenda Reyes concerning subservicer servicing transfer issues (.2); reviewed Bankruptcy Court order approving sale of loans from Barclays DIP warehouse line (.3); attend call with FTL, E. Moser, and Dentons, T. Moyron, C. Montgomery and L. Macksoud (.6).
10/22/22	L. Macksoud	3.90	3,003.00	B130	Call with C. Montgomery, T. Moyron and S. Maizel to discuss resolution of open issue with MassMutual (.8), review all transaction documents and revise draft stipulation provided by counsel to Mass Mutual (2.4), calls and emails with C. Montgomery to discuss same (.5) and draft email to working group re same (.2).
10/23/22	L. Macksoud	1.00	770.00	B130	Review further revisions to draft stip with MassMutual (.3), calls and emails with working group re same (.2), participate in call with counsel to MassMutual to discuss stip (.5).

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Date	Timekeeper	Hours	Amount	Task	Narrative
10/24/22	R. Wicks	0.60	399.00	B130	Review and revise notice of successful bidding.
10/24/22	T. Moyron	0.60	474.00	B130	Review analysis regarding FirstLine and research (.2); correspond with R. Richards, et al., re same (.2); conference call with N. Peterman re same (.1); correspond with A. Samples re same (.1).
10/24/22	E. Smith	0.80	820.00	B130	Reviewed DIP facility mortgage loan purchase and sale order (.5); correspondence with counsel for subservicer (.3).
10/24/22	S. Maizel	0.20	194.00	B130	Zoom conference with Stratmor, A. Samples, etc. re sale issues.
10/24/22	L. Macksoud	2.70	2,079.00	B130	Review revisions to MassMutual stipulation as provided by MassMutual's counsel and draft responses to questions from C. Montgomery re same (.5), call with Dentons and FTI to discuss stipulation and recovery of assets from MassMutual (1.0), call with C. Montgomery to discuss response on MassMutual stip (.6), call with counsel to MassMutual to discuss same (.3), follow up with FTI on same (.3).
10/24/22	G. Miller	0.20	154.00	B130	Emails with T. Moyron and T. Meerovich re list of contracts potentially to be assumed in sale.
10/25/22	C. Montgomery	0.20	242.00	B130	Communications with E.L. Smith with regard to Click & Close loan servicing sale (.2).
10/25/22	T. Moyron	0.60	474.00	B130	Analyze research regarding research regarding enforceability of purchase options and related matters (.4); and prepare emails to R. Richards re same (.2).
10/25/22	E. Smith	0.80	820.00	B130	Reviewed and prepared correspondence, and conferred by telephone with counsel for subservicer regarding transfer of servicing of loans being sold off the DIP warehouse line (.5); confer with Claude Montgomery regarding same (.3).

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Date	Timekeeper	Hours	Amount	Task	Narrative
10/26/22	E. Smith	1.30	1,332.50	B130	Reviewed and prepared correspondence with counsel for subservicer and FGMC (G. Reyes) regarding transfer of servicing to purchaser of mortgage loans off the Barclays DIP repo warehouse line (.8); reviewed and prepared correspondence regarding new principal amount of cash flow DIP loan (.4); confer with C. Montgomery regarding servicing rights transfer questions in connection with subservicer claim settlement (.1).
10/26/22	S. Maizel	0.30	291.00	B130	Zoom conference with Stratmor, etc. re sale issues (.2); telephone conference with D. Oien re sale issues (.1).
10/26/22	T. Moyron	0.60	474.00	B130	Conference call with R. Richards, D. Oien, et al., re JV interest (.4); analyze further emails from R. Richards, et al., re same (.2).
10/26/22	T. Moyron	1.40	1,106.00	B130	Conference call T. Cairns, N. Peterman, and E. Howe re sale (.6); call with T. Cairns re same (.2), C. Montgomery (.4), and further call with T. Cairns re same (.2).
10/26/22	T. Moyron	0.70	553.00	B130	Conference call with L. Jones and T. Cairns re LVS credit bid, sale, and related issues.
10/26/22	T. Moyron	0.60	474.00	B130	Conference call with A. Samples re LVS credit bid (.2) and conference call with T. Meerovich re same (.4).
10/26/22	T. Moyron	1.30	1,027.00	B130	Analyze emails from T. Meerovich, et al., regarding TIAA (.6); analyze emails from Hunton, et al., regarding MassMutual (.3) and analyze related terms of stipulation (.4).
10/26/22	S. Schrag	0.40	260.00	B130	Participate in reoccurring call with D. Oien, J. John, T. Moyron, and S. Maizel regarding bids and other outstanding items.
10/27/22	R. Wicks	0.40	266.00	B130	Correspond with client regarding purchase offers for jv interest.
	Subtotal	57.10	48,985.50		

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B140 - Relief from Stay/Adequate Protection Proceedings

Date	Timekeeper	Hours	Amount	Task	Narrative
10/05/22	T. Moyron	1.20	948.00	B140	Analyze motion for relief from stay re K. Crutcher and related issues (.6); conference call with counsel for PIMCO re same (.6).
10/07/22	T. Moyron	1.20	948.00	B140	Call with D. Oien, FCA counsel, and S. Maizel re amended complaint (.5); analyze motion for relief from stay and related issues (.7).
10/07/22	S. Maizel	0.60	582.00	B140	Zoom conference with D. Oien, etc. re motion for relief for stay re FCA litigation.
10/07/22	C. Montgomery	0.30	363.00	B140	Loop Up call with Shulte Roth, Greenberg and Dentons regarding Qui Tam lift stay motion (.3).
10/18/22	S. Schrag	1.20	780.00	B140	Review correspondence from Optimal Blue counsel regarding motion for relief from stay (.1); prepare response (.1); confer with T. Cairns, T. Moyron, and S. Maizel regarding the same (.3); confer with Optimal Blue counsel regarding the same (.2); review further correspondence and underlying motion (.5).
10/19/22	G. Miller	0.70	539.00	B140	Draft response to motion to lift stay re qui tam action.
10/19/22	R. Wicks	0.30	199.50	B140	Begin to prepare opposition to Crutcher motion for relief from stay.
10/19/22	S. Schrag	1.60	1,040.00	B140	Confer with M. Delaney regarding Optimal Blue's motion for relief from stay (.2); review claims as filed (.3); review and analyze draft motion (.5); confer with T. Moyron, T. Cairns, and S. Maizel regarding the same (.3); confer with M. Delaney regarding the same (.3).
10/20/22	G. Miller	3.80	2,926.00	B140	Draft response to Crutcher motion to lift stay.
10/20/22	R. Wicks	6.10	4,056.50	B140	Continue to draft response to Crutcher motion for relief from stay.
10/21/22	R. Wicks	4.40	2,926.00	B140	Revise opposition to Crutcher motion for relief from stay to add additional 3rd Circuit authority.

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Date	Timekeeper	Hours	Amount	Task	Narrative
10/21/22	T. Moyron	0.80	632.00	B140	Analyze opposition to motion for relief from stay and prepare comments thereto.
10/22/22	R. Wicks	0.40	266.00	B140	Review comments from local counsel on opposition to motion for relief from stay and revise motion to include same.
10/23/22	R. Wicks	0.70	465.50	B140	Revise opposition to Crutcher motion for relief from stay.
10/23/22	R. Wicks	0.30	199.50	B140	Strategize with local counsel and lender counsel regarding revisions to opposition to Crutcher motion for relief from stay.
10/23/22	S. Maizel	0.60	582.00	B140	Review and revise response to Crutcher motion for relief from stay.
10/24/22	S. Maizel	0.50	485.00	B140	Review and revise response to Crutcher motion for relief from stay.
10/24/22	T. Moyron	1.30	1,027.00	B140	Analyze GT comments to opposition to motion for relief from stay re Krutcher (.2); correspond with counsel for Pimco regarding Pimco's comments (.2); analyze updated redlines and finalize same (.6); correspond with R. Wicks and S. Maizel re same (.3).
10/24/22	R. Wicks	3.20	2,128.00	B140	Revise opposition to Crutcher motion for relief from stay based on edits from local counsel and lender counsel.
10/25/22	S. Maizel	0.60	582.00	B140	Telephone conference with R. Wicks re Qui Tam issues.
10/29/22	L. Harrison	1.70	1,938.00	B140	Review Crutcher stay relief motion and exhibits (.80); review UCC joinder to debtors' opposition to Crutcher stay relief motion (.50); review debtors' opposition to Crutcher stay relief motion (.40).
10/31/22	S. Schrag	0.30	195.00	B140	Confer with M. Delaney regarding stay motion (.1); review correspondence from the same (.1); confer with T. Cairns regarding the same (.1).
	Subtotal	31.80	23,808.00		

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B150 - Meetings of and Communications with Creditors

Date	Timekeeper	Hours	Amount	Task	Narrative
10/02/22	C. Montgomery	0.80	968.00	B150	Communications with T. Moyron and M. Indelicato regarding PIMCO affiliated individuals (.8).
10/03/22	G. Medina	0.90	324.00	B150	Correspond with A. Estrada and KCC Team regarding creditor inquiry (0.1); review SOFA and SOAL regarding notice address for Jessies Landing Condominium (0.4); respond to William Mitchell and include Excerpts of the SOFA and SOAL in response to question regarding the notice received (0.4).
10/04/22	G. Medina	0.10	36.00	B150	Correspond with W. Mitchell attorney for a creditor regarding inquiry.
10/16/22	C. Montgomery	0.60	726.00	B150	Participate in Zoom call with M. Powers, M. Indelicato, T. Moyron and L. Jones regarding committee plan support (.6).
10/16/22	S. Maize1	0.70	679.00	B150	Zoom conference with Committee counsel re pending issues.
10/24/22	S. Schrag	0.40	260.00	B150	Prepare material for 341 Meeting (.3); confer with T. Moyron and T. Meerovich regarding the same (.1).
10/25/22	S. Maize1	0.20	194.00	B150	Telephone conference re Mass Mutual issues.
10/25/22	S. Maize1	0.50	485.00	B150	Telephone conference with FTI, etc. re TIAA issues.
10/25/22	S. Maize1	0.10	97.00	B150	Telephone conference with J. Huston re Qui Tam claim.
10/25/22	S. Maize1	0.50	485.00	B150	Telephone conference with FTI, A. Samples, etc re Mass Mutual issues.
10/25/22	S. Maize1	0.80	776.00	B150	Telephone conference with FTI, T. Moyron, etc. re Customers issues (.2); telephone conference with C. Montgomery re same (.2); review and respond to emails re same (.4).
10/27/22	C. Montgomery	0.90	1,089.00	B150	Phone call with Committee including M. Power, M. Indelicato, T. Moyron and T. Cairns regarding sale issues, MassMutual, Budget issues (.9).

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Date	Timekeeper	Hours	Amount	Task	Narrative
	Subtotal	6.50	6,119.00		

B160 - Fee/Employment Applications

Date	Timekeeper	Hours	Amount	Task	Narrative
10/10/22	G. Medina	2.00	720.00	B160	Prepare First Monthly Fee application per T. Moyron's comments (1.2); correspond and send the updated First Monthly to J. Moe (0.3); Incorporated additional changes from J. Moe in the DUS First monthly application (0.3); send draft of revised DUS First Monthly to T. Moyron, S. Maizel and J. Moe for review (0.2).
10/14/22	G. Medina	1.00	360.00	B160	Correspond with I. Ortiz regarding DUS first monthly fee application (0.2); send to T. Moyron, S. Maizel and J. Moe redline of the DUS First monthly along with the draft and monthly statement (0.4); review monthly statement for August 2022 and correspond with T. Moyron, S. Maizel and J. Moe regarding formatting issues on the statement (0.4).
10/14/22	J.A. Moe, II	3.30	2,508.00	B160	Dentons' Second Monthly Fee Application/ Preliminarily review the draft Invoice for services performed in August, 2022 (.10); commence reviewing and annotating the Case Docket for the month of August to prepare descriptions of services (.80); review and annotate the 147 page Invoice for the month of August to prepare description of services (2.40).
10/18/22	G. Medina	0.20	72.00	B160	Correspond with T. Moyron regarding expense question on first monthly fee application.
10/18/22	G. Medina	4.90	1,764.00	B160	Correspond with J. Moe and T. Moyron regarding second monthly fee application (0.2); Work on draft of second monthly fee application (4.5); correspond with J. Moe and send Draft of second monthly fee application (0.2).

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Date	Timekeeper	Hours	Amount	Task	Narrative
10/18/22	J.A. Moe, II	2.60	1,976.00	B160	Dentons' Second Monthly Fee Application/ Review and revise the first draft of the descriptions of services performed by Dentons on behalf of the Debtors, integrating descriptions of work performed in August with the documents referred to in the Docket for August (1.80); prepare first draft of the insert on services performed in July and August in regard to the Financing/ Cash Collateral Category Of Service for the September Invoice (.80).
10/18/22	J.A. Moe, II	0.20	152.00	B160	Dentons' First Monthly Fee Application/ Review descriptions of services performed by Dentons during the month of July and make minor revisions.
10/19/22	G. Medina	0.10	36.00	B160	Correspond with J. Moe regarding draft of the second monthly fee application.
10/19/22	J.A. Moe, II	2.30	1,748.00	B160	Prepare Dentons' Second Monthly Fee Application (1.30); preliminarily review the first draft of the proposed insert for the Second Monthly Fee Application consisting of the description of service for the Financing/Cash Collateral Category Of Service (.10); revise the third draft of 22 of 23 descriptions to services for the Second Monthly Fee Application (.90).
10/20/22	G. Medina	0.40	144.00	B160	Call with J. Moe regarding Statement for August 2022.
10/20/22	J.A. Moe, II	0.90	684.00	B160	Dentons' Second Monthly Fee Application/ Completely revise the first section of the descriptions of services in the Financing/ Cash Collateral Category Of Service (.30); prepare all 23 descriptions of services in regard to work performed by Dentons during the month of August for inclusion into the Second Monthly Fee Application (.60).

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Date	Timekeeper	Hours	Amount	Task	Narrative
10/21/22	J.A. Moe, II	0.90	684.00	B160	Dentons' Second Monthly Fee Application/ Telephone call with attorney Chris O'Leary on terms referenced utilized by attorneys in the August Invoice (.10); additional revisions to the 23 descriptions of services, utilizing additional parentheticals, continuing to review the Docket for the identification of documents and dates and inserting additional references to dates and documents into the descriptions, and inserting references to dates that orders were entered on Motions prepared and filed by Dentons (.80).
10/24/22	J.A. Moe, II	1.10	836.00	B160	Dentons' Second Monthly Fee Application/ Revise the latest version of the 23 descriptions of services performed during the month of August for Dentons' August Monthly Fee Application, including review of the descriptions to insure all revisions are included.
10/25/22	G. Medina	1.30	468.00	B160	Correspond with J. Moe and review narratives for Second Monthly Fee application (0.4); correspond with I. Ortiz regarding folding in narratives to draft fee application (0.1); review draft send of Second Monthly fee application (0.3); correspond with J. Moe and send Draft of Second Monthly (0.2); received comment, revise and resend to J. Moe (0.3).
10/26/22	J.A. Moe, II	0.70	532.00	B160	Dentons' Second Monthly Fee Application/ Review the completed draft of the proposed Second Monthly Fee Application, making minor revisions to the descriptions of services and noting necessity to revise amount on fees and total amount of fees and costs (.60); review the completed Fee Application with revisions included (.10).
10/26/22	G. Medina	0.60	216.00	B160	Further revise and send Second monthly per the request of J. Moe to T. Moyron and S. Maizel.

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Date	Timekeeper	Hours	Amount	Task	Narrative
10/31/22	S. Schrag	1.10	715.00	B160	Confer with M. Proctor regarding professional fee payments (.4); review procedures (.2); confer with J. John regarding Buckley's fees (.1); confer with M. Proctor regarding certificate of no objection (.1); review correspondence from M. Caloway regarding the same (.2); confer with M. Proctor regarding the same (.1).
Subtotal		23.60	13,615.00		

B185 - Assumption/Rejection of Leases and Contracts

Date	Timekeeper	Hours	Amount	Task	Narrative
10/03/22	C. Montgomery	0.20	242.00	B185	Communications with A. Samples regarding Mass Mutual (.1); communications with T. Meerovich regarding TIAA data (.1).
10/03/22	S. Schrag	0.70	455.00	B185	Confer with T. Moyron regarding notice of list of potential assumption/assignment contracts (.1); conduct research regarding notice (.4); confer with J. John and FTI regarding the same (.1); review correspondence from M. Jacobson and M.A. Kaptain regarding exhibit (.1).
10/03/22	S. Schrag	0.40	260.00	B185	Participate in reoccurring call with D. Oien, J. John, S. Maizel, and T. Moyron regarding assumption list and D&O insurance policy.
10/04/22	S. Schrag	1.90	1,235.00	B185	Begin drafting cure notice (.2); review Bidding Procedures Order (.3); review exhibit 3 (.2); confer with M. Caloway regarding the same (.2); review order (.3); confer with J. John and J. MacKay regarding filing the same (.1); confer with M. Caloway regarding final exhibit (.1); confer with J. John regarding the same (.2); review and revise exhibit (.3).
10/05/22	S. Schrag	0.20	130.00	B185	Review correspondence from Freddie Mac counsel related to Cure Notice (.1); confer with J. John regarding the same (.1).
10/07/22	C. Montgomery	0.40	484.00	B185	Phone call with L. Macksoud regarding TIAA lift stay motion (.3); follow communications regarding TIAA numbers and review same (.1).

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Date	Timekeeper	Hours	Amount	Task	Narrative
10/07/22	C. Montgomery	0.70	847.00	B185	Participate in TIAA analysis call including T, Meerovich, T. Moyron and A. Samples (.7).
10/10/22	C. Montgomery	0.50	605.00	B185	Communications with M. Hyland regarding administrative claim dispute with Mass Mutual and TIAA (.2); phone call with T. Moyron regarding same (.1); communications with P. Partee regarding Mass Mutual discussion (.1); communications with L. Macksoud regarding draft response to TIAA (.1).
10/11/22	C. Montgomery	0.90	1,089.00	B185	Communications with L. Macksoud regarding TIAA responses (.8); communications with P. Partee and J.R. Smith regarding Barings questions (.1).
10/12/22	C. Montgomery	1.10	1,331.00	B185	Confer with L. Macksoud regarding TIAA assumption request motion (.2); phone call with J. R. Smith and L. Macksoud regarding Mass Mutual servicing issues (.2); communications with A. Samples and T. Meerovich regarding same (.1); draft information letter to J.R. Smith regarding client communications history (.6).
10/12/22	C. Montgomery	0.60	726.00	B185	Communications with T Meerovich regarding Mass Mutual communications (.3); communications with J.R. Smith regarding Mass Mutual information demands (.3).
10/13/22	C. Montgomery	1.70	2,057.00	B185	Communications with A. Samples, T. Moyron regarding Mass Mutual information request (.6); communications with J.R. Smith regarding settlement information limitations (.2); communications and phone call with L. Macksoud regarding update of TIAA letter (.2); communications with J. Mossop regarding updated information for TIAA and review of same (.2); revise and update TIAA letter (.4); communications with G. Reyes re same (.1).
10/18/22	S. Schrag	1.10	715.00	B185	Correspond with T. Moyron regarding cure objections (.3); review cure objections of TIAA and Sourcepoint (.7); correspond with I. Ortiz regarding TIAA cure objection (.1).

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Date	Timekeeper	Hours	Amount	Task	Narrative
10/18/22	C. Montgomery	2.50	3,025.00	B185	Communications with L. Macksoud regarding TIAA objection and review same (.7); review TIAA objection to cure amounts (.2); review revised debtor's response and revise same (1.4); communications with J.R. Smith and T. Meerovich regarding Mass Mutual Servicing agreements (.2).
10/19/22	C. Montgomery	1.40	1,694.00	B185	Continued revision to Response to TIAA motion to compel assumption or rejection (.9); communications with L. Macksoud regarding same (.1); phone call with L. Macksoud regarding set off issue regarding same (.1); follow up communications regarding same with T. Moyron, S. Maizel, N. Peterman (.3).
10/19/22	S. Schrag	0.20	130.00	B185	Confer with T. Moyron regarding cure notice objections (.1); review and analyze the same (.1).
10/19/22	T. Moyron	0.60	474.00	B185	Analyze and prepare comments to TIAA objection (.3); correspond with L. Macksoud, GT, et al., re same (.3).
10/19/22	S. Maizel	0.80	776.00	B185	Review and revise TIAA motion to compel assumption or rejection (.6); review and respond to emails re same (.2).
10/20/22	C. Montgomery	2.90	3,509.00	B185	Review information from T. Meerovich regarding bid tape data for Mass Mutual and communications with T. Meerovich regarding same (.3); communications with JR. Smith regarding settlement information and willingness to engage (.3); research regarding TIAA adversary proceeding and communications with Darien regarding same (.3); communications with T. Moyron and JR Smith regarding settlement conversations (.3); phone call with J. Miller regarding Deutsche Bank cure amount dispute (.2); review TIAA sale objection and communications with T. Meerovich regarding same (.3); communications with L. Macksoud and T. Moyron regarding settlement meeting and schedule coordination (.4); communications with T. Moyron regarding possible proposal to Mass Mutual (.8).
10/21/22	S. Schrag	0.30	195.00	B185	Review and analyze cure claims.

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Date	Timekeeper	Hours	Amount	Task	Narrative
10/21/22	C. Montgomery	4.00	4,840.00	B185	Communications with J.R. Smith and T. Meerovich regarding Mass Mutual request for updated information and review provided spreadsheet (.4); zoom call with J.R. Smith, P. Partee, L. Macksoud, T. Moyron regarding settlement (1.3); follow up call with T. Moyron and L. Macksoud (.8); communication with L. Macksoud and T. Moyron regarding possible settlement framework (1.5).
10/22/22	C. Montgomery	2.10	2,541.00	B185	Prepare for and participate in Zoom call including T. Moyron, S. Maizel, L. Macksoud regarding Mass Mutual settlement stipulation (1.5); communications with T. Meerovich regarding Custodial accounts (.2); phone call with L. Macksoud regarding changes to Mass Mutual Stipulation (.4).
10/23/22	C. Montgomery	2.50	3,025.00	B185	Communications with T. Moyron and L. Macksoud regarding changes to Mass Mutual Stipulation (.3); further review and edits to same (.9); communications with T. Moyron regarding TIAA resolution (.1); communications with JR Smith regarding proposed stipulation (.1); communications with T. Meerovich and A. Samples regarding same (.1); follow up communications with T. Meerovich (.1); participate in Zoom call with JR smith, R. Paget, T. Moyron and L. Macksoud (.4); communications with JR Smith and T. Moyron regarding Hunto further revised draft (.5).
10/24/22	S. Schrag	0.10	65.00	B185	Review correspondence regarding cure notice.
10/24/22	C. Montgomery	2.10	2,541.00	B185	Zoom call with T. Moyron, L. Macksoud regarding upcoming Mass Mutual call (.3); participate in zoom call with J. R. Smith, J. Paget , T. Moyron regarding and others regarding cash reserves issues (.5); Dentons internal calls regarding Mas Mutual issues raised during Hunton call with T. Moyron and L Macksoud and S. Maizel (1.3).
10/24/22	C. Montgomery	0.10	121.00	B185	Communications with L. Macksoud and T. Moyron regarding Mass Mutual stipulation issues (.1).

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Date	Timekeeper	Hours	Amount	Task	Narrative
10/25/22	C. Montgomery	5.70	6,897.00	B185	Communications with J.R. Smith and T. Meerovich regarding settlement stipulation (.2); communications with D. Oien regarding TIAA Servicing agreements (.2); zoom call with J. R. Smith, T. Meerovich, T. Moyron regarding settlement stipulation (.4); follow up call regarding same with T. Meerovich (.1); communications with D. Oien regarding Rushmore agreements for Mass Mutual and basic servicing (.1); communications with J. R. Smith re same (.1); communications with T. Meerovich and A. Samples regarding same (.1); review TIAA remittance information and Participate in zoom call With J. Retherford regarding settlement Reserve (1.0); communications with J. Retherford regarding information requests (.1); communications With T. Meerovich And G. Reyes regarding updated Mass Mutual information (.1); zoom call with T. Meerovich and J. Mossop, A. Samples and L. Macksoud regarding updated Mass Mutual numbers (.7); communications with J. R. Smith re same (.1); review revised settlement stipulation and extended Teams call with T. Meerovich re same (2.1); communications with T. Moyron re same (.1); phone call with T. Moyron re same (.2); communications with J.R. Smith re revised settlement stipulation (.1).
10/25/22	S. Schrag	0.20	130.00	B185	Review correspondence related to assumption list.

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Date	Timekeeper	Hours	Amount	Task	Narrative
10/26/22	C. Montgomery	4.80	5,808.00	B185	Draft TIAA settlement language and communications with T. Moyron, L. Macksoud re same (.7); communications with A. Samples regarding subservicing agreement (.2); communications with J. Retherford and T. Moyron re same (.7); phone calls with T. Meerovich re same and confirming understanding of paragraph 3 (.2); phone call and Email with J. R. Smith re same (.2); conforming revisions to Stipulation (.6); phone call M. Caloway re filing of Stipulation (.4); review TIAA agreement re funding and communications with T. Meerovich re same (.1); communications with M. Caloway re Mass Mutual filing (.1); phone calls with E.L. Smith and T. Meerovich on TIAA cooperation issues (.1); draft language modification for TIAA confirmation order (.5); communications with T. Meerovich regarding TIAA reserve amount (.1); communications with A. Samples and T. Meerovich regarding TIAA funding (.1); review motion to shorten and motion to approve stipulation and communications with M. Caloway regarding same (.8).

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Date	Timekeeper	Hours	Amount	Task	Narrative
10/27/22	C. Montgomery	3.40	4,114.00	B185	Communications with J. Retherford and T. Meerovich regarding TIAA language for rejection (.2); communications with JR Smith, M. Caloway and T. Moyron regarding motion to approve and motion to shorten and revisions to drafts of same (1.0); phone call with T. Meerovich regarding TIAA resolution (.1); communications with J. Retherford regarding cooperation issues (.3); review updated draft of motion from MassMutual (.4); review updated TIAA draft language and communications with T. Moyron, T. Meerovich and A. Samples re same (.1); communications with N. Peterman regarding same (.1); phone Call N. Peterman And E. Howe regarding reasons to Support TIAA And MassMutual settlements (.3);communications with UST and T. Meerovich re information behind MassMutual stipulation (.6); communications with R. Richards regarding confirmation language for TIAA (.1); phone call with M. Caloway re filing for MassMutual (.2).
10/29/22	C. Montgomery	0.50	605.00	B185	Communications with T. Moyron and J.R. Smith regarding meeting and litigation (.2); communications with Rushmore counsel regarding MassMutual Tipukation (.2); communications withT. Meerovich re same (.1).
10/29/22	S. Schrag	0.40	260.00	B185	Review Optimal Blue filings (.3); confer with T. Cairns regarding the same (.1).

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Date	Timekeeper	Hours	Amount	Task	Narrative
10/30/22	C. Montgomery	5.00	6,050.00	B185	Zoom call with J.R. Smith, Barings representatives , T. Moyron, T. Meerovich regarding cash balances and possible transactions (.8); follow up conference call with T. Meerovich and T. Moyron re same (1.6); communications with K. Ferrier regarding Rishmore questions on Masa Mutual Stipulation (.4); communications with K. Ferrier regarding stipulation (.1); review advance numbers from T. Meerovich (.1); confer with A samples regarding Rushmore impact on Mass Mutual (.2); phone call with JR Smith and T. Moyron and A. Samples regarding distribution \$2.5 million (.4); draft language re same (.7); review Mass Mutual response to distribution proposal and communications with A. Samples and T. Meerovich re same (.3); communications with JR Smith, TMeerovich and A Samples regarding updated cash distribution agreement (.4).
Subtotal		50.00	56,976.00		

B190 - Other Contested Matters (excl. assumption/rejection motions)

Date	Timekeeper	Hours	Amount	Task	Narrative
10/07/22	T. Moyron	0.80	632.00	B190	Correspondence with K. Manoukian, G. Miller, et al., regarding Qui Tam and analyze related issues.
10/11/22	T. Moyron	0.40	316.00	B190	Analyze Qui Tam discovery requests (.2); correspond with M. Harris, et al., re same (.2).
10/11/22	T. Moyron	0.70	553.00	B190	Call with FCA counsel, D. Oien and S. Maizel re FCA claim.
10/12/22	S. Alberts	0.10	99.00	B190	Emails about WARN litigation.
10/12/22	P. Shah	1.90	1,092.50	B190	Drafted responses to Interrogatories.
10/12/22	P. Shah	1.60	920.00	B190	Drafted responses to Requests for Production.
10/12/22	P. Shah	1.30	747.50	B190	Review of D&O and E&O insurance policies.

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Date	Timekeeper	Hours	Amount	Task	Narrative
10/12/22	P. Shah	1.40	805.00	B190	Drafted general objections to Interrogatories and Requests for Production.
10/14/22	P. Shah	1.40	805.00	B190	Review file to draft responses to Interrogatories.
10/14/22	S. Alberts	0.60	594.00	B190	Communicate about WARN claim issues by email (.1) and phone call with working group about motion for class certification and potential settlement of WARN claims (.5).
10/14/22	S. McCandless	0.50	492.50	B190	Conference call with Dentons team to discuss WARN Act defenses to class action claims.
10/14/22	S. McCandless	0.90	886.50	B190	Review Motion to allow motion for class certification and related supporting court filings.
10/15/22	S. McCandless	0.90	886.50	B190	Prepare information on WARN Act defenses and forward same to Dentons team.
10/17/22	J.A. Moe, II	2.50	1,900.00	B190	Complete review of docket in connection with Second Monthly Fee Application (.30); prepare first draft of 22 of 23 descriptions of services for Dentons' Second Monthly Fee Application (1.90); review and provide example of formatting of the descriptions of services for Dentons' Second Monthly Fee Application (.10); review process of formatting the Second Monthly Fee Application's descriptions of services (.20).
10/18/22	S. Alberts	0.80	792.00	B190	Conference with L. Manning about WARN issues in advance of tomorrow's call with WARN counsel (.2), email (.1) and then conference with D. Oien about WARN related questions (.2) and follow up with L. Manning (.1), receive request from T. Moyron and schedule call with WARN plaintiff (.1) and follow up (.1).
10/18/22	S. McCandless	0.20	197.00	B190	Communicate with T. Moyron and S. Alberts regarding strategy for discussion with opposing counsel regarding WARN defenses.

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Date	Timekeeper	Hours	Amount	Task	Narrative
10/19/22	S. McCandless	1.30	1,280.50	B190	Review communication from S. Alberts assessing alleged WARN Act damages (.30); respond to same (.10); further communicate with S. Alberts regarding absence of ability to have been paid commissions to eliminate commission claims (.20); further related communications with Dentons team and FTI regarding calculation of damages (.30); further communications with Dentons team regarding other defenses and calculations of alleged damages (.40).
10/19/22	S. McCandless	0.20	197.00	B190	Communicate with T. Moyron and S. Alberts regarding plan for organization and contents of call with opposing counsel.
10/19/22	S. McCandless	1.70	1,674.50	B190	Conference call with WARN opposing counsel to assert defenses (.90); prepare for same (.80).
10/19/22	S. Alberts	2.10	2,079.00	B190	Receive inquiry from T. Moyron about defenses to WARN claim and respond (.1), conference with L. Manning about WARN calculation issues before call with WARN Plaintiffs' counsel (.2), inquiry as to claims registry assessment with respect to WARN actions (.1), receive response (.1) and request updating (.1), conduct quick review of claims registry in advance of WARN Plaintiffs' call (.3) conference with T. Moyron in advance of call with WARN Plaintiffs' counsel as to who covers which issues (.2), conference with WARN Plaintiffs' (.9), follow up with T. Moyron (.1).
10/20/22	P. Shah	0.20	115.00	B190	Review of client email concerning notice of claims to insurers.
10/21/22	P. Shah	0.40	230.00	B190	Review of five emails proving notice of claims re insurance-related matters.
10/21/22	P. Shah	0.60	345.00	B190	Drafted responses to discovery based on emails from Lockton providing notice of claims.

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Date	Timekeeper	Hours	Amount	Task	Narrative
10/21/22	S. Alberts	6.20	6,138.00	B190	Review Excel of employees who filed POCs and that requested priority based on WARN or otherwise and cross reference against complaints (.5); contact T. Moyron re same (.1); obtain from FTI list of employees terminated on 6/24 (.1), send list of employees to KCC (.1); receive confirmation from KCC that all employees received notice of the Bar Date (.1); follow up email and call with S. Ruben concerning POC summary and employees (.2); draft communication to working group concerning observations about filed POCs and WARN complaint (.4) review and assess motion for class certification and supporting papers (1.1); review model objections to similar requests from Verity and consider potential arguments in opposition to class certification in pending WARN Action (1.7), conference with T. Moyron about objection to class certification and related issues (.3), Conference with T. Cairns about objection to class certification (.3), request research on impact of class claimants failing to file proof of claim (.1), receive and assess research (.3), draft and send email to S. McCandless, R. Heidenreich and M. Harris concerning Motion for Class Certification and questions regarding the same (.4); arrange and conduct call with M. Harris and C. Doherty about opposition to WARN class certification (.5).
10/22/22	R. Richards	1.80	1,692.00	B190	Review Firstline LLC Operating Agreement (0.5); review background emails (0.1); review Rhode Island LLC statute (0.3); search for existing research on impact of bankruptcy on member on LLC Rights and purchase option and review online articles (0.6); draft summary of findings (0.3).

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10/23/22	S. Alberts	4.00	3,960.00	B190	Review Hoover regarding challenging class certification (.5) and consider facts in light of Hoover (.4), communicate with C. Doherty seeking research on issue related to class certification challenge (.3); contact FTI seeking information on severance payments (.1), receive response from FTI and review results (.2), forward results to litigation team (.1) and follow up with FTI (.1); receive response from C. Doherty on research question (.1), communicate with D. Olin about severance question (.1), receive response from D. Olin (.1), follow up with D. Olin and receive response (.2), inquiry to S. McCandless about scope of service WARN notice to employees and limitations on scope (.2) receive response from S. McCandless (.1), and follow up inquiry to Sandy McCandless (.1), receive response (.2); draft and forward to working group assessment/recommendation concerning objection to motion for class certification (.9); receive question from T. Moyron on deadline for objection to class certification and respond (.1), receive request for confirmation of work stream on Plan insert and objection to class certification from T. Moyron (.1) and respond (.1).
10/23/22	S. McCandless	1.40	1,379.00	B190	Communicate with S. Alberts regarding assigned offices as related to recipients of WARN notices for WARN Act defenses (.40); provide list of employees by facility as relevant to WARN Act notice decisions to Dentons team and explanation of same (.70); provide additional background information to Dentons team (.30).
10/24/22	D. Cook	1.40	868.00	B190	Research regarding enforceability of purchase option against a debtor LLC owner (1.1); draft email for Dentons team review regarding same (.3).

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Date	Timekeeper	Hours	Amount	Task	Narrative
10/24/22	S. Alberts	2.20	2,178.00	B190	Respond to T. Moyron re: M. Harris' views on scope of objection to class certification (.2); revised Introduction and certain other portions of draft objection to class certification (1.7) and send to M. Harris for expansion (.2), receive acknowledgment and reply (.1).
10/24/22	P. Shah	0.40	230.00	B190	Revised FGMC's Objections and Responses to Discovery.
10/24/22	R. Wicks	3.30	2,194.50	B190	Research issues relating to membership purchase option and the automatic conversion of management rights.
10/24/22	S. McCandless	0.60	591.00	B190	Review communications with opposing counsel in preparation for review of opposition to class certification (.30); discuss approach to opposition to class certification with R. Heidenreich (.30).
10/25/22	R. Wicks	3.10	2,061.50	B190	Continue to research issues relating to membership purchase option and the automatic conversion of management rights.
10/25/22	R. Wicks	0.20	133.00	B190	Correspond with client regarding LLC purchase option issues.
10/25/22	S. Alberts	1.10	1,089.00	B190	Communicate with M. Harris's about objection to WARN Certification motion (.2); prepare for settlement call with T. Moyron (.3), settlement call (.4), and follow up with T. Moyron (.2).
10/25/22	T. Moyron	0.40	316.00	B190	Analyze matters related to Crutcher's response and next steps.
10/25/22	R. Richards	0.80	752.00	B190	Review supplemental research on purchase option and related issues and related cases (0.6); replies to follow up email inquiries regarding analysis (0.2).
10/26/22	T. Moyron	0.40	316.00	B190	Conference call with GT, K. Manoukian, et al., re Qui Tam plaintiff.
10/26/22	R. Richards	1.10	1,034.00	B190	Emails regarding strategy on purchase option for Firstline JV and related analysis (0.3); call with client regarding strategy (0.4), emails with Pimco's counsel (0.1); review Pimco sale related materials related to Firstline from Geoff Miller (0.3).

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Date	Timekeeper	Hours	Amount	Task	Narrative
10/26/22	R. Wicks	0.20	133.00	B190	Correspond with client to discuss status of research into LLC purchase option and membership interest issues.
10/26/22	R. Wicks	0.10	66.50	B190	Analyze issues relating to LLC operating agreement.
10/26/22	R. Wicks	0.50	332.50	B190	Call with client to discuss issues related to sale.
10/26/22	R. Wicks	0.10	66.50	B190	Correspond with PIMCO's counsel regarding LLC agreement.
10/26/22	S. McCandless	2.50	2,462.50	B190	Review and consider communication from S. Alberts regarding opposing counsel's comments on details of June WARN notice (.20); respond to S. Alberts regarding same (.10); related review of said notice (.20); instructions to J. Peterson regarding confirmatory research (.40); initial related research (.40); further discuss information needed with J. Peterson (.40); initial review of case support for unforeseen business circumstances and faltering company exceptions (.80).
10/27/22	S. McCandless	2.70	2,659.50	B190	Review case law supporting unforeseen business circumstances and faltering company exceptions to WARN Act for response to opposing counsel (1.30); prepare write up regarding same and forward to S. Alberts and Dentons team (1.40).
10/27/22	S. Alberts	1.90	1,881.00	B190	Review Opposition to Class certification brief and note comments (1.1), Conference with M. Harriss about comments and filing issues (.3), receive and review A. Samples Declaration (.2), receive and review revised brief comments (.2) and authorize circulation for review (.1).
10/27/22	T. Moyron	0.20	158.00	B190	Conference call with N. Peterman re quit tam plaintiff, proposed settlement and other matters.
10/27/22	T. Moyron	0.10	79.00	B190	Analyze e mail from counsel for qui tam plaintiff and respond to same.
10/27/22	C. Doherty, Jr.	0.20	139.00	B190	Review Proofs of Claim regarding response to class certification brief.

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10/27/22	C. Doherty, Jr.	0.10	69.50	B190	Call with M. Harris regarding same.
10/27/22	C. Doherty, Jr.	0.10	69.50	B190	Review and comment on draft of response to class certification.
10/27/22	R. Richards	0.20	188.00	B190	Emails regarding purchase option.
10/27/22	R. Wicks	0.50	332.50	B190	Call with client regarding settlement terms with Carrington and Rushmore.
10/28/22	R. Wicks	0.30	199.50	B190	Correspond with client and settling parties regarding settlement term sheets with Carrington and Rushmore.
10/28/22	G. Medina	1.20	432.00	B190	Received request from T. Moyron to retrieve Kari Crutcher pleadings (0.1); review docket and retrieve pleadings, prepare, index and binder cover (0.8); coordinate with office services to deliver binder to T. Moyron (0.3).
10/28/22	S. McCandless	2.10	2,068.50	B190	Review and analyze Opposition to Motion for WARN Class Certification (1.40); telephone call with M. Harris to propose and decide specific revisions to same (.70).
10/28/22	S. Alberts	0.60	594.00	B190	Email concerning opposition to class certification (.1), review final changes to opposition (.4) and gave my approval to file (.1).
10/29/22	G. Medina	0.40	144.00	B190	Review and send Kari Crutcher's Motion to Lift Stay and related pleadings to L. Harrison.
10/30/22	D. Cook	0.30	186.00	B190	Analyze caselaw related to qui tam dispute at request of L. Harrison and T. Moyron.
	Subtotal	65.20	54,832.50		

B220 - Employee Benefits/Pension

Date	Timekeeper	Hours	Amount	Task	Narrative
10/04/22	S. Alberts	0.50	495.00	B220	Receive emails about KEIP and KERP waiver requirement (.1) review terms of KEIP and KERP (.1), respond (.1), receive request for assistance and respond (.2).
10/07/22	C. Doherty, Jr.	0.20	139.00	B220	Review claims database and send responsive email to T. Moyron regarding WARN claimants.

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Date	Timekeeper	Hours	Amount	Task	Narrative
10/19/22	C. Doherty, Jr.	0.30	208.50	B220	Respond to emails from T. Moyron and S. Alberts with legal questions concerning WARN adversary.
10/20/22	C. Doherty, Jr.	0.10	69.50	B220	Review WARN claim analysis prepared by S. Ruben.
10/21/22	C. Doherty, Jr.	1.00	695.00	B220	Prepare first draft of objection to class claim.
10/21/22	C. Doherty, Jr.	0.40	278.00	B220	Call with S. Alberts and M. Harris re class certification issues.
10/21/22	C. Doherty, Jr.	1.80	1,251.00	B220	Research and draft email memorandums re bankruptcy procedure questions re class certification (1.6); research for forms and precedent for plan brief re class certification issues.
10/21/22	C. Doherty, Jr.	0.20	139.00	B220	Review and respond to emails re plan and adversary employee issues.
10/23/22	C. Doherty, Jr.	0.20	139.00	B220	Review and respond to emails re research for class certification response.
10/24/22	C. Doherty, Jr.	1.00	695.00	B220	Research and draft email memorandum regarding bankruptcy questions for class certification response.
10/24/22	C. Doherty, Jr.	0.20	139.00	B220	Review draft of class certification motion.
10/24/22	S. Alberts	0.10	99.00	B220	Receive inquiry from PBGC concerning whether there is a DB Plan.
	Subtotal	6.00	4,347.00		

B230 - Financing/Cash Collections

Date	Timekeeper	Hours	Amount	Task	Narrative
10/02/22	C. Montgomery	4.40	5,324.00	B230	Communications with L. Manning regarding Customers loan sale time line and review related agreements (.5); begin drafting Customers bank demand letter (3.7); phone call and communications with L. Macksoud regarding Customers Sale timing assertions (.2).

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Date	Timekeeper	Hours	Amount	Task	Narrative
10/03/22	C. Montgomery	3.60	4,356.00	B230	Communications with T. Moyron and revise Customers demand letter (1.7); zoom call with E. Howe regarding impact of Customers Bank Default notice (.4); communications with A. Samples, T. Meerovich and D. Oien regarding same (.8); phone call A. Samples and finalize Customers Demand letter (.5); review Greenberg response to Customers Bank default notice (.2).
10/03/22	T. Moyron	0.30	237.00	B230	Analyze email from KCC re bar date motion, costs and related issues (.1); correspond with G. Miller re same (.2).
10/04/22	E. Smith	0.90	922.50	B230	Attended status call with representatives of cash flow DIP lender, M. Schwarzmman and N. Peterman, FGMC, A. Samples, FTL, T. Meerovich, and Dentons, T. Moyron.
10/05/22	T. Moyron	0.30	237.00	B230	Call with A. Samples re Balbec, timing of wind-down and other matters.
10/05/22	C. Montgomery	1.40	1,694.00	B230	Zoom call with L. Macksoud regarding Multi-bank correcting funds transfer, DIP Lender Fee Invoice and Flagstar cash request (.4); communications with K. Biron and L. Macksoud regarding Flag tar funding request (.1); review FTI customers bank information and communications with L. Manning regarding same (.8); communications with J. Langdon regarding dropped loans and review same (.1).
10/06/22	C. Montgomery	0.70	847.00	B230	Teams call regarding Cash Flow Lender update including M. Schwarzmman, T. Moyron, T. Meerovich, L. Manning (.5); communications with E. Howe regarding reporting waiver (.2).
10/06/22	E. Smith	0.90	922.50	B230	Attended status call with representatives of cash flow DIP lender, M. Schwarzmman and N. Peterman, FGMC, A. Samples, FTL, T. Meerovich, and Dentons, T. Moyron (.5); reviewed and prepared correspondence with counsel for subservicer regarding timeframe to complete servicing transfer once loans on the DIP repo line are sold by FGMC (.4).
10/06/22	T. Moyron	0.60	474.00	B230	Call with M. Schwarzmman, N. Peterman, et al., re Bravo re-occurring call regarding pending issues, including Customers.

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10/06/22	T. Moyron	0.90	711.00	B230	Call with FGMC, FTI, and Dentons, including T. Meerovich, A. Samples, S. Maizel, et al. regarding priority items and next steps, including plan matters.
10/07/22	T. Moyron	0.70	553.00	B230	Conference call with T. Meerovich, C. Montgomery, et al., regarding TIAA analysis.
10/10/22	S. Maizel	1.30	1,261.00	B230	Zoom conference with FTI, A. Samples, etc. re priority issues.
10/10/22	C. Montgomery	0.20	242.00	B230	Communications with T. Meerovich, T. Moyron regarding reserves for Mass Mutual remittance dispute (.2).
10/11/22	C. Montgomery	4.20	5,082.00	B230	Communications with A. Samples regarding Customers communications on Rocktop and Versa loan sales (.8); communications with M. Hyland and T. Meerovich regarding Flagstar advance payoff (.2); cash Flow DIP Lender status call in including M. Schwarzmman, T. Meerovich, T. Moyron (.9); follow up call with E Howe regarding remittance documentation (.5); follow up communications with E. Howe and T. Meerovich re same (.6); communications with T. Meerovich regarding Flagstar account (.2); zoom call with L. Macksoud, T. Moyron, S. Maizel regarding post effective date budget estimate (1.0).
10/11/22	T. Moyron	0.80	632.00	B230	Call with M. Schwarzmman, N. Peterman, T. Meerovich, A. Samples et al. re Customers, WARN, Qui Tam, and other matters.
10/11/22	E. Smith	0.90	922.50	B230	Attended update call with representatives of cash flow DIP lender, M. Schwarzmman and N. Peterman, FGMC, A. Samples, FTI, T. Meerovich, and Dentons, T. Moyron.
10/11/22	S. Maizel	0.80	776.00	B230	Call with M. Schwarzmman, N. Peterman, T. Meerovich, A. Samples et al. re Customers, WARN, Qui Tam, and other matters.
10/12/22	C. O'Leary	0.30	255.00	B230	Review/analyze Plano HQ lease and exchange correspondence re: the same.
10/12/22	T. Moyron	1.10	869.00	B230	Teams meeting regarding priority issues with FGMC, FTI, and Dentons, including T. Meerovich, S. Maizel, et al., re sale, plan, and other matters.

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Date	Timekeeper	Hours	Amount	Task	Narrative
10/13/22	E. Smith	0.80	820.00	B230	Attended update call with representatives of cash flow DIP lenders, M. Schwarzmann and N. Peterman, FGMC, A. Samples, FTI, T. Meerovich, and Dentons, T. Moyron.
10/13/22	T. Moyron	0.50	395.00	B230	Call with Buckley, FTI, S. Maizel, et al. re pipeline fundings.
10/13/22	T. Moyron	0.80	632.00	B230	Participate in Bravo call with GT, M. Schwarzmann, FTI, S. Maizel, A. Samples, et al., regarding various issues, including warehouse lenders, plan, and other matters.
10/13/22	C. O'Leary	1.10	935.00	B230	Office conference G. Miller re: DBNTYC invoices (0.4); review/analyze Angel Oak POC and exchange correspondence re: the same (0.4); review/analyze correspondence from Morgan Lewis re: DBNTC invoices and exchange correspondence re: the same (0.3).
10/13/22	C. Montgomery	4.10	4,961.00	B230	Review Flagstar report (1.0); phone call with E. Howe regarding Mortgage Funding amount repayment (.1); communications with T. Meerovich regarding same (.1); communications with M. Hyland regarding budget waiver request (.2); review Credit Agreement and draft waiver request (.5); participate in Teams call with T. Meerovich, T. Moyron and others regarding pipeline funding questions raised by regulators (.4); communications with E. Moser and M. Schwarzmann regarding customers loan sales (.2); participate in Cash Flow DIP Lender call (.8); communications with T. Meerovich regarding repayment of Mortgage Funding Amount (.1); review Final DIP Repo order and communications with Barclays counsel regarding repayment of Mortgage Funding Amount (.5); further communications with E. Howe regarding same (.2).

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Date	Timekeeper	Hours	Amount	Task	Narrative
10/14/22	C. Montgomery	1.10	1,331.00	B230	Phone call with P. Partee regarding mortgage loan proceeds issue (.1); phone call from T. Moyron regarding wind down issues (.3); communications with FTO regarding cash flow DIP repayment notice and requirements (.4); communications with E. Howe regarding voluntary repayment of Cash Flow DIP mortgage funding amount (.3).
10/14/22	C. O'Leary	0.40	340.00	B230	Review/analyze TCB Credit Agreement and exchange correspondence re: remedies and sale accounting.
10/14/22	T. Moyron	0.50	395.00	B230	Correspond with T. Meerovich regarding TCB (.1); correspond with C. O'Leary and L. Smith re same (.1); analyze related issues re liquidation and accounting (.2); prepare email to TCB counsel re accounting (.1).
10/17/22	T. Moyron	1.50	1,185.00	B230	Teams meeting with FGMC, FTI, and Dentons, including A. Samples, T. Meerovich, D. Oien, et al., regarding priority items, including wind-down matters and related materials.
10/17/22	C. Montgomery	2.10	2,541.00	B230	Participate in FTI teams call with T. Meerovich, L. Manning, A. Samples, T. Moyron regarding wind-down budget (1.5); communications with M. Hyland regarding Greenberg DIP Lender invoices (.1); phone call L. Manning regarding modification of DIP Facility (.4); review updated cash flow (.1).
10/17/22	C. Montgomery	4.50	5,445.00	B230	Review Amended Combined Plan and Disclosure Statement and draft amendment to Cash Flow DIP Credit Agreement to Implement Advance Funding requirements under Plan (4.5).

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Date	Timekeeper	Hours	Amount	Task	Narrative
10/18/22	C. Montgomery	3.10	3,751.00	B230	Communications from E. Howe regarding information requests (.1); zoom call with S. Maizel, L. Macksoud and T. Moyron regarding DIP funding for plan (.4); communications with T. Meerovich regarding same (.1); Teams call with S. Maizel, T. Meerovich, L. Manning, T. Moyron regarding additional funding needs (1.0); communications with N. Peterman and E. Howe regarding additional DIP funding (.2); communications with A. Samples regarding same (.1); prepare for and participate in Lenders Teams call including M. Schwarzmman, N. Peterman, T. Meerovich, A. Samples and others (1.2).
10/18/22	C. Montgomery	1.10	1,331.00	B230	Discuss regulatory wind-down issues and related budget impact (1.0); communications with T. Moyron and S. Maizel regarding results of same (.1).
10/18/22	E. Smith	1.00	1,025.00	B230	Attended update call with representatives of cash flow DIP lender, M. Schwarzmman and N. Peterman, FGMC, A. Samples, FTI, T. Meerovich, and Dentons, C. Montgomery.
10/18/22	S. Maizel	1.30	1,261.00	B230	Zoom conference call with Bravo, GT, etc. re DIP financing (.3); zoom conference with FTI, etc. re winddown financing (1.0).
10/19/22	T. Moyron	0.70	553.00	B230	Conference call with T. Meerovich re plan matters and wind-down (.5); analyze email from N. Peterman re call and items to discuss (.1); and prepare response thereto (.1).
10/19/22	C. O'Leary	0.60	510.00	B230	Review/analyze Planet Home MSR Purchase Agreements and exchange correspondence re: the same (0.4); exchange correspondence re: DBNTC invoices (0.2).
10/19/22	C. Montgomery	0.60	726.00	B230	Communications with T. Meerovich regarding customers fees (.5); communications with T. Meerovich and M. Hyland regarding GNMA sales and proceeds remittance instructions (.1).

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Date	Timekeeper	Hours	Amount	Task	Narrative
10/19/22	C. Montgomery	2.20	2,662.00	B230	Review board and lender presentation on wind-down plan (1.5); communications with T. Moyron and E. Moser regarding additional Dentons comments to Wind-down Plan presentation (.1); review updated presentation (.3); review Flagstar Penalty Fee issue (.2); communications with W. Moser regarding wind-down presentation (.1).
10/20/22	C. Montgomery	0.90	1,089.00	B230	Participate in DIP Lender call with M. Schwarzmann, T. Meerovich, T. Moyron and others (.5); phone call from M. Hyland regarding waiver request (.1); communications with E. Howe regarding same (.3).
10/20/22	C. O'Leary	0.30	255.00	B230	Exchange correspondence re: Planet Home MSR Purchase Agreements.
10/20/22	E. Smith	0.40	410.00	B230	Attended status call with representatives of cash flow DIP lender, M. Schwarzmann and N. Peterman, FGMC, A. Samples, FTI, T. Meerovich, and Dentons, T. Moyron and C. Montgomery.
10/20/22	T. Moyron	0.40	316.00	B230	Participate in Bravo call with GT, T. Meerovich, M. Schwarzman, et al., regarding pending issues, including warehouse lender, sale, etc.
10/21/22	C. O'Leary	0.80	680.00	B230	Office conference L. Macksoud re: Planet MSR Purchase Agreements and exchange correspondence re: the same.
10/21/22	C. Montgomery	0.50	605.00	B230	Communications with M. Schwarzmann regarding additional funding requests and discussion agenda (.1); participate in wind-down call with Cash Flow DIP Lender (.4).
10/22/22	C. Montgomery	1.20	1,452.00	B230	Communications with N. Peterman regarding Customers Bank communications (.1); draft response letter to Customers (1.1).
10/23/22	T. Moyron	0.50	395.00	B230	Call with C. Montgomery, J.R. Smith, et al., re Mass Mutual stipulation (.3); analyze updated stipulation (.2).

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Date	Timekeeper	Hours	Amount	Task	Narrative
10/23/22	C. Montgomery	0.40	484.00	B230	Communications with N. Peterman regarding Cash Flow DIP amendments and Budget waivers (.1); communications with T. Meerovich regarding same (.1); draft milestone waiver request (.2).
10/24/22	T. Moyron	2.10	1,659.00	B230	Conference call with T. Meerovich, C. Montgomery, et al., re MassMutual (.1); participate in Teams Call with FGMC, FTL, and Dentons, including T. Meerovich, A. Samples, et al., regarding priority items, including plan matters (1.2); conference call with counsel for MassMutual, C. Montgomery and S. Maizel re stipulation (.3); Dentons internal call with C. Montgomery, S. Maizel and L. Macksoud re MassMutual (.5).
10/24/22	C. O'Leary	0.20	170.00	B230	Exchange correspondence re: Mass Mutual EBO Purchase Agreements.
10/24/22	T. Moyron	0.90	711.00	B230	Analyze Hunton, T. Meerovich, et al., correspondence re Mass Mutual (.7); analyze Balch and C. Montgomery correspondence re TIAA (.2).
10/24/22	C. Montgomery	0.80	968.00	B230	Draft waiver request regarding plan consummation milestone (.3); review amendment to DIP Credit agreement sent by N. Peterson and comments regarding same to T. Meerovich (.5).
10/25/22	T. Moyron	1.00	790.00	B230	Participate in Teams Meeting with Bravo, FGMC, FTL, et al., regarding pending issues, including warehouse lenders, plan, WARN, and other matters.
10/25/22	C. Montgomery	1.80	2,178.00	B230	Participate in priority claims review Teams call with T. Meerovich and T. Moyron in advance of lender call (.4); Participate in DIP Lender call with T. Meerovich, M. Schwarzmans regarding lender update (.9); review revised credit note for Cash Flow Dip Lender and commentsbrw same to T. Meerovich (.5).
10/25/22	T. Moyron	0.90	711.00	B230	Conference call with T. Meerovich, C. Montgomery, et al., re MassMutual (.3); analyze related emails from C. Montgomery, Hunton, et al., re same (.6).

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10/25/22	T. Moyron	0.30	237.00	B230	Conference call with Hunton, C. Montgomery, et al., regarding MassMutual.
10/26/22	T. Moyron	0.90	711.00	B230	Teams meeting with T. Meerovich, L. Manning, FGMC, C. Montgomery, et al., regarding admin/priority claims, settlements, and other matters.
10/26/22	C. Montgomery	1.80	2,178.00	B230	Complete drafting waiver request for Plan Consilumation (.2); communications with M. Hyland and B. Oppenheimer regarding the Note principal amount (.1); participate in tail end of lender budget discussion (.2); zoom call with N. Peterman, E. Howe M. Schwarzmman re effective date funding (1.1); follow up call with T. Moyron re same (.1); communications with B. Oppenheimer and T. Moyron re DIP note (.1).
10/27/22	C. Montgomery	0.10	121.00	B230	Communications with M. Hyland regarding Budget waiver request (.1).
10/27/22	C. Montgomery	2.10	2,541.00	B230	Communications with E. Howe regarding budget waiver and corrected budget Waiver (.5); draft motion to approve amended DIP Credit Agreement (1.6).
10/27/22	T. Moyron	0.70	553.00	B230	Call with N. Peterman, E. Howe, T. Meerovich, L. Jones, et al., regarding budget, plan, and other matters (.5); and follow up call with L. Jones regarding same and hearing (.2).
10/27/22	T. Moyron	0.70	553.00	B230	Analyze matters related to amendment of credit agreement (.3); conference calls with C. Montgomery re same (.2); conference calls with L. Jones re same (.2).
10/28/22	T. Moyron	1.10	869.00	B230	Analyze email from N. Peterman and reply thereto re funding request (.1); call with T. Meerovich re same (.1); calls with N. Peterman (.1) and M. Schwarzmman re same (.1); call with T. Meerovich, L. Manning, C. Montgomery, et al., re funding request and response (.5); analyze emails from E. Moser re funding (.1); prepare email to N. Peterman re funding request (.1).
10/28/22	T. Moyron	0.40	316.00	B230	Conference call with J.R. Smith re MassMutual and LWLA (.3); prepare emails to J.R. Smith re same (.1).

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Date	Timekeeper	Hours	Amount	Task	Narrative
10/28/22	C. Montgomery	16.20	19,602.00	B230	Continued drafting of motion to approve DIP credit and proposed order agreement (15.4); phone call with L. Whidden regarding review of draft (.1); phone call with M. Caloway regarding motion to shorten (.1); communications with T. Moyron re drafts of Motion and Order (.1).
10/28/22	L. Whidden	4.40	4,268.00	B230	Confer with C Montgomery re: Amendment to Cash Flow DIP Credit Agreement (.3); review prior orders and agreements (1.4); work on Motion Seeking Approval of Amendment to Cash Flow DIP (1.5); work on proposed order (.9).
10/29/22	C. Montgomery	1.30	1,573.00	B230	Review credit agreement and confirmation order comments tied to same (.8); draft revised credit agreement (.5).
10/30/22	C. Montgomery	7.30	8,833.00	B230	Review and revise draft motion to approve Cash Flow DIP credit agreement (4.4); phone calls with L. Macksoud (.3) T. Moyron (.2) and E. Howe re same (.1); review GT modification to credit agreement motion (.6); phone conference with T. Moyron, TMeerovich, and N. Peterman (.5); phone call with E. Howe regarding effective date issue for funding (.2); multiple calls and communications regarding revisions to credit agreement (.2); revisions to motion (.5); and revisions to order (.3).
10/30/22	T. Moyron	3.70	2,923.00	B230	Call with MassMutual, counsel for MassMutual, T. Meerovich, C. Montgomery, et al., regarding turnover of funds, potential settlement, and related matters (.8); call with T. Meerovich and C. Montgomery re same (1.2); meetings with C. Montgomery and A. Sample re MassMutual (1.2); exchange emails with counsel for MassMutual re same (.1); call with counsel for MassMutual, C. Montgomery, and A. Samples (.4).
10/30/22	T. Moyron	1.30	1,027.00	B230	Analyze matters related to amendment to DIP agreement, motion, and other issues and meetings with C. Montgomery re same.
10/31/22	C. Montgomery	7.80	9,438.00	B230	Continued review of Greenberg rewrite to Motion and Credit Agreement (3.1); continue to prepare documentation related thereto (4.7).

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Date	Timekeeper	Hours	Amount	Task	Narrative
10/31/22	C. O'Leary	0.30	255.00	B230	Exchange correspondence re: Rushmore/Mass Mutual stipulation.
	Subtotal	115.80	125,987.50		

B240 - Tax Issues

Date	Timekeeper	Hours	Amount	Task	Narrative
10/03/22	S. Dhaliwal	4.20	3,276.00	B240	Research regarding transfer of NOLs to third parties in bankruptcy, and COBE requirement to NOLs.
10/06/22	C. Montgomery	0.40	484.00	B240	Communications with T. Meerovich regarding NOL follow up (.1); communications with K. Verner regarding historical tax reports (.2); communications with R. Williams regarding same (.1).
10/07/22	R. Williams	0.50	520.00	B240	Review NOL information and spreadsheets.
10/09/22	R. Williams	0.50	520.00	B240	Review NOL information and attention to 382 analysis.
10/10/22	R. Williams	2.40	2,496.00	B240	Further review of NOL information; analysis of bankruptcy restructuring alternatives under 382 rules.
10/10/22	S. Dhaliwal	3.40	2,652.00	B240	Continue analyzing tax issues regarding NOLs.
10/11/22	R. Williams	1.00	1,040.00	B240	Analysis of 382 bankruptcy rules; discuss open tax issues with S. Dhaliwal.
10/12/22	R. Williams	0.60	624.00	B240	Review financials and tax returns; further analysis of bankruptcy restructuring alternatives.
10/17/22	J. Harrington	1.30	1,527.50	B240	Review trust agreement for U.S. tax issues.
10/28/22	J. Harrington	0.50	587.50	B240	Review changes to liquidating trust agreement (0.3); send US tax comments to R. Richards (0.2).
10/29/22	J. Harrington	0.90	1,057.50	B240	Review further changes to liquidating trust agreement (0.4); send US tax comments to R. Richards (0.5).
10/30/22	J. Harrington	0.20	235.00	B240	Email exchange with R. Richards regarding US tax comments.
	Subtotal	15.90	15,019.50		

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B260 - Board of Directors Matters

Date	Timekeeper	Hours	Amount	Task	Narrative
10/27/22	E. Smith	1.10	1,127.50	B260	Attended meeting of the Board of Directors of FGMC with representatives of FTI, T. Meerovich, FGMC, A. Samples, and Dentons, T. Moyron.
10/27/22	T. Moyron	1.20	948.00	B260	Participate in Board meeting regarding plan, outstanding matters and claims.
10/27/22	S. Schrag	0.20	130.00	B260	Confer with T. Moyron regarding Board call (.1); confer with D. Cook regarding the same (.1).
	Subtotal	2.50	2,205.50		

B300 - Claims and Plan

Date	Timekeeper	Hours	Amount	Task	Narrative
10/05/22	E. Smith	0.40	410.00	B300	Review motion of relator to transfer venue of qui tam action from Georgia to Delaware (.2); prepare loan subservicing transfer correspondence (.2).
10/10/22	R. Richards	0.60	564.00	B300	Review Kari Crutcher lift stay motion (0.4); background emails re indemnification and insurance issues (0.2).
10/11/22	R. Richards	3.00	2,820.00	B300	Review insurance policies implicated by Kari Crutcher lift stay motion (1.7); review claims register for relevant claims (0.3); conference call regarding Crutcher lift stay motion and related matters (1.0).
10/11/22	P. Shah	0.40	230.00	B300	Review and analysis of discovery propounded.
10/12/22	R. Richards	0.50	470.00	B300	Review Crutcher discovery requests (0.2); call with Shah re same (0.1); send potential responsive documents to Shah (0.2).
10/13/22	S. Ruben	0.20	105.00	B300	Correspond with Dentons team re status of general unsecured claims (.1); create list of administrative claims filed (.1).
10/13/22	C. Montgomery	0.20	242.00	B300	Communication with B. Rost, S. Schrag, T. Cairns T. Moyron regarding landlord claim and letter of credit (.2).

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Date	Timekeeper	Hours	Amount	Task	Narrative
10/13/22	C. Montgomery	1.40	1,694.00	B300	Communications with T. Cairns, T. Moyron regarding QuivTam proof of claim objection (.4); research penalties question and communications with M. Caloway re same (1.0).
10/14/22	S. Ruben	2.40	1,260.00	B300	Create list of administrative claims filed (2.3); conference with L. Macksoud re retained causes of action (.1).
10/14/22	R. Richards	1.10	1,034.00	B300	Review AIG filed proof of claim (0.2); prepare for call regarding pending lift stay motion (0.2); participate in lift stay and insurance related call (0.7).
10/14/22	R. Richards	1.10	1,034.00	B300	Review draft of Liquidating Trust Agreement and compare to recent model of LTA agreement (1.0); follow up emails regarding the agreement (0.1).
10/14/22	E. Smith	0.40	410.00	B300	Review and prepare correspondence regarding warehouse provider accounting for value of loans liquidated to reduce the outstanding warehouse debt (.3); engage with T. Moyron and representative of Rushmore on claim review (.1).
10/15/22	E. Smith	0.30	307.50	B300	Confer with T. Moyron regarding creditor claim negotiations (.2); reviewed bankruptcy docket sheet (.1).
10/15/22	T. Moyron	6.60	5,214.00	B300	Research and analyze case law regarding Qui Tam actions, and issues related to standing, underlying claim, and 1141(d)(6) (4.5); analyze amended complaint, motion for relief from stay, claim and amended claim, and other documents in connection with other documents (1.2); and prepare analysis regarding objection to amended claim based on statute and underlying claim (.9).
10/15/22	R. Richards	0.30	282.00	B300	Review and comment on draft response to discovery.
10/16/22	S. Ruben	0.20	105.00	B300	Correspond with T. Moyron and KCC team re filed unsecured and administrative claims (.1); analyze the same (.1).
10/16/22	C. Montgomery	0.60	726.00	B300	Communications with M. Caloway, T. Moyron and L. Jones regarding Qui Tam claim objection for voting purposes (.6).

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Date	Timekeeper	Hours	Amount	Task	Narrative
10/16/22	E. Smith	1.40	1,435.00	B300	Review summary of subservicer relationship with FGMC (.3); review subservicer claims with representatives of FGMC, A. Samples, FTI, T. Meerovich, and Dentons team, T. Moyron, regarding upcoming claim negotiation with subservicer (.6); review and prepare correspondence regarding subservicer claims (.5).
10/17/22	S. Ruben	0.10	52.50	B300	Correspond with T. Moyron and Ankura re analysis of administrative expense claims (.1).
10/17/22	R. Richards	2.00	1,880.00	B300	Review combined plan and disclosure statement as filed (1.6); review IRS insert (0.2); emails re Liquidating Trust Agreement (0.2).
10/17/22	R. Richards	0.20	188.00	B300	Review email from Lockton on insurance matters.
10/17/22	T. Moyron	0.20	158.00	B300	Correspond with FCA counsel regarding objection re Krutcher amended claim (.1); analyze comments from FCA counsel to objection re same (.1).
10/17/22	E. Smith	1.40	1,435.00	B300	Review and prepare correspondence regarding claim settlement discussions (.2); review summary of claims by and against subservicer and FGMC (.2); attended call with representatives of subservicer, J. Grebinar, Dentons, T. Moyron, and FGMC, A. Samples, to present summary of the claims and a proposed settlement (1.0).
10/17/22	C. Montgomery	0.10	121.00	B300	Review Administrative claims list and communications with T. Moyron regarding impact on wind-down budget (.1).
10/18/22	R. Richards	4.10	3,854.00	B300	Review model confirmation orders from Pachulski (1.0); prepare draft of confirmation order (2.6); emails re IRS insert (0.2); emails re liquidating trust reporting (0.3).
10/18/22	J. Harrington	1.50	1,762.50	B300	Respond to questions from R. Richards regarding trust's tax reporting responsibilities (0.5); review US tax discussion in filing (0.5); respond to questions from R. Richard regarding tax treatment of trust (0.5).

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Date	Timekeeper	Hours	Amount	Task	Narrative
10/19/22	S. Ruben	0.30	157.50	B300	Correspond with T. Moyron and FTI re analysis of administrative expense claims and reserve amount (.1); correspond with Dentons team re WARN Act claims analysis and spreadsheet (.2).
10/19/22	R. Richards	1.20	1,128.00	B300	Work on draft of Confirmation Order and related emails.
10/19/22	C. Montgomery	0.80	968.00	B300	Phone calls with T. Moyron and L. Macksoud regarding response to KCC classification request for various Bravo affiliated and Customers Bank claims (.4); communications with N. Peterman regarding open plan issues (.1); review UST plan comments (.2); communications with L. Macksoud regarding same (.1).
10/20/22	C. Montgomery	0.30	363.00	B300	Communications with E. Howe and E. Estrada regarding ballots for Pimco related entities (.1); review Planet POC (.2).
10/20/22	R. Richards	0.50	470.00	B300	Finalize and circulate draft of confirmation order.
10/20/22	R. Richards	0.20	188.00	B300	Emails regarding response to discovery.
10/21/22	R. Richards	0.30	282.00	B300	Review insurance related notices for Kari Crutcher Qui Tam action.
10/21/22	C. Montgomery	1.10	1,331.00	B300	Communications with L. Macksoud regarding Angel Oak setoffs and class 4 (.3); Teams call with L. Macksoud, M. Jacobson regarding class 4 and Planet Home (.2); Teams call with M. Jacobson, T. Meerovich, L. Macksoud regarding planet home class 4 proposal and analysis (.6).
10/24/22	R. Richards	0.30	282.00	B300	Review updated docket and emails regarding additional confirmation order insert.
10/24/22	C. Doherty, Jr.	3.60	2,502.00	B300	Prepare memo regarding WARN Issues.
10/24/22	C. Doherty, Jr.	0.80	556.00	B300	Call with S. McCandless regarding WARN memo.
10/24/22	C. Doherty, Jr.	1.80	1,251.00	B300	Prepare research and draft email memorandums regarding research questions for Plan re WARN.

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Date	Timekeeper	Hours	Amount	Task	Narrative
10/24/22	S. McCandless	4.80	4,728.00	B300	Communicate with S. Alberts regarding WARN section of Confirmation brief (.10); initial review and analysis of S. Alberts' partial draft of WARN section of Confirmation Brief (.40); communicate with S. Alberts and C. Doherty regarding same (.20); review and analyze First Day Declaration, CRO's declaration and related timelines, and WARN notice for revisions and additions to same (.90); discuss additions and revisions to S. Alberts' initial draft of WARN section of confirmation brief with C. Doherty (.40); review initially revised version of WARN section of confirmation brief following same (.60); review related earlier background research to supplement and revise WARN section of confirmation brief (.70); annotate WARN section of confirmation brief for additions and revisions to same (.50); discuss, supplement, and revise WARN section of confirmation brief with C. Doherty (.80); communicate with S. Alberts and T. Moyron regarding same (.20).
10/24/22	R. Wicks	0.10	66.50	B300	Begin to review response to Crutcher claim objection.
10/24/22	C. Montgomery	0.60	726.00	B300	Communications with E. Moser regarding Rushmore account.
10/25/22	C. Montgomery	0.60	726.00	B300	Phone call with L. Macksoud regarding Planet Home settlement in Class 4 (.4); phone calls with J. Huston and S. Maizel regarding Qui Tam resolution for confirmation (.2).
10/25/22	C. Montgomery	2.00	2,420.00	B300	Communications with S. Alberts, T. Moyron regarding WARN claim computation issue and zoom call regarding same (.8); participate in admin and priority claims call with L. Manning, T. Moyron and S. Maizel and others (.7); communications and Phone call with S. Maizel regarding Customers Bank asserted unsecured claim for voting (.3); communications with Rachel Storian re Customers vote (.1); communications with L. Macksoud regarding Planet voting (.1).
10/25/22	R. Wicks	2.20	1,463.00	B300	Review and analyze Crutcher opposition to claim objection.

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Date	Timekeeper	Hours	Amount	Task	Narrative
10/25/22	R. Wicks	0.30	199.50	B300	Correspond with interested parties regarding call to discuss reply in support of Crutcher claim objection and set up zoom call regarding same.
10/25/22	R. Wicks	0.70	465.50	B300	Strategize with Sam Maizel regarding drafting reply in support of Crutcher claim objection.
10/25/22	R. Wicks	6.00	3,990.00	B300	Draft reply in support of Crutcher claim objection.
10/25/22	S. McCandless	3.80	3,743.00	B300	Prepare detailed information on WARN defenses for T. Moyron, S. Alberts, and K. Doherty for confirmation brief (1.30); discuss WARN defenses for additions to confirmation brief with S. Alberts and C. Doherty (.50); further communicate with S. Alberts regarding same (.10); provide additional requested information for WARN Act defenses (.60); prepare and forward additional information on legal background to defenses and related list of questions (.90); further review and communicate with C. Doherty and S. Alberts regarding background facts for defenses (.40).
10/25/22	C. Doherty, Jr.	0.50	347.50	B300	Call with S. McCandless, S. Alberts regarding insert for WARN issues regarding confirmation brief.
10/25/22	C. Doherty, Jr.	0.40	278.00	B300	Prepare emails regarding sizing of WARN reserve.
10/25/22	C. Doherty, Jr.	5.60	3,892.00	B300	Prepare insert regarding WARN issues for confirmation brief.
10/25/22	C. Doherty, Jr.	0.40	278.00	B300	Research case docket for information requested for settlement discussions regarding WARN reserve.
10/25/22	C. Doherty, Jr.	0.30	208.50	B300	Follow up calls with S. Alberts regarding WARN and plan issues.
10/25/22	R. Richards	1.20	1,128.00	B300	Emails re US insert (0.2); call with US DOJ regarding the insert (0.4); review Freddie Mac insert (0.2); update and circulate the confirmation order (0.4).

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Date	Timekeeper	Hours	Amount	Task	Narrative
10/25/22	T. Moyron	0.90	711.00	B300	Teams call with L. Manning, A. Samples, C. Montgomery, et al., regarding admin and priority asserted claims and various related matters (.6); analyze related issues re confirmation (.3).
10/26/22	R. Richards	2.00	1,880.00	B300	Emails regarding inserts for confirmation order (0.3); review confirmation objections (1.2); further revise and circulate confirmation order (0.5).
10/26/22	C. Doherty, Jr.	0.40	278.00	B300	Provide comments to questions from S. Alberts regarding WARN Brief insert.
10/26/22	C. Doherty, Jr.	0.10	69.50	B300	Call with S. Alberts regarding insert for brief.
10/26/22	R. Wicks	2.70	1,795.50	B300	Prepare reply in support of claim objection.
10/26/22	R. Wicks	0.10	66.50	B300	Strategize with local counsel regarding motion to extend exclusivity.
10/26/22	R. Wicks	0.20	133.00	B300	Correspond with PSZJ regarding reply in support of claim objection.
10/26/22	R. Wicks	0.60	399.00	B300	Review plan objections.
10/26/22	R. Wicks	0.50	332.50	B300	Call with lender counsel and local counsel to discuss qui tam issues.
10/26/22	R. Wicks	0.20	133.00	B300	Correspond with client regarding settlement with Carrington.
10/27/22	R. Wicks	0.30	199.50	B300	Correspond with local counsel regarding insert for confirmation brief.
10/27/22	S. Ruben	8.20	4,305.00	B300	Prepare confirmation brief (2.3); conference with T. Moyron re inserts to confirmation brief related to objections to confirmation (.1); conference with Dentons and Pachulski teams re exculpation issues (.6); conference with T. Moyron re revisions to confirmation brief (.7); conference with Dentons team re inserts responding to objections and declarations (.9); conference with Andres Estrada of KCC re voting tabulation (.2); conference with T. Moyron re inserts to brief (.2); conference with C. Montgomery re section 1129 issues (.3); further revise confirmation brief per T. Moyron comments (2.9).
10/27/22	R. Wicks	0.90	598.50	B300	Prepare term sheets for settlements with Carrington and Rushmore.

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Date	Timekeeper	Hours	Amount	Task	Narrative
10/27/22	R. Wicks	0.20	133.00	B300	Correspond with PIMCO counsel regarding Crutcher insert for confirmation brief.
10/27/22	R. Richards	2.00	1,880.00	B300	Calls from government attorney regarding extension request and open comments (0.3); follow up emails re same (0.2); review comments received on confirmation order (1.1); further emails on confirmation order and related inserts (0.4).
10/27/22	E. Smith	2.10	2,152.50	B300	Confer with T. Moyron, C. O'Leary and J. Murphy regarding claim settlement term sheets (.7), reviewed summaries of settlement terms (.3); reviewed settlement terms with FGMC team, A. Samples and D. Oien, and Dentons team, J. Murphy (.9); confer with T. Moyron regarding satisfaction of plan confirmation requirement (.2).
10/27/22	C. Doherty, Jr.	2.50	1,737.50	B300	Prepare WARN Insert for confirmation brief.
10/27/22	C. Doherty, Jr.	0.40	278.00	B300	Review and respond to emails regarding confirmation hearing and brief.
10/27/22	C. Doherty, Jr.	0.10	69.50	B300	Review draft of declaration for reply from A. Samples.
10/27/22	S. McCandless	0.80	788.00	B300	Review WARN Plan insert for confirmation brief.
10/27/22	C. Montgomery	0.70	847.00	B300	Participate in zoom call with A. Samples, L. Smith, R. Wicks, D. Oien regarding Carrington and Rushmore claim settlements (.5); review Rushmore class 4 settlement draft (.2).
10/28/22	E. Smith	8.30	8,507.50	B300	Prepare and distribute subservicer claim settlement term sheets to counsel for settling subservicers (2.7); review and prepared correspondence regarding subservicer claim settlement term sheets (.3); review subservicer comments on claims settlement term sheets (1.1); review claim settlement approval process with representatives of claim settling counterparties and T. Moyron (2.0); revise claim settlement term sheet (1.8); review provisions of the POR, including Section 14.1, as it relates to settlements of claims (.4).
10/28/22	C. Montgomery	0.50	605.00	B300	Review Carrington claim and voting situation.

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Date	Timekeeper	Hours	Amount	Task	Narrative
10/28/22	S. McCandless	0.50	492.50	B300	Consider S. Alberts question regarding WARN notice references in reply confirmation brief and related contents of Opposition to Class Certification (.30); reply to same (.20).
10/28/22	C. Doherty, Jr.	0.50	347.50	B300	Prepare comments to draft of confirmation brief.
10/28/22	C. Doherty, Jr.	0.20	139.00	B300	Review filings from Oct. 27 and Oct 28 related to plan confirmation.
10/28/22	R. Wicks	0.70	465.50	B300	Review revisions to confirmation brief.
10/28/22	R. Wicks	0.10	66.50	B300	Review motion to waive local rule 3017.
10/28/22	R. Wicks	0.30	199.50	B300	Prepare Aaron Samples declaration.
10/28/22	R. Wicks	0.50	332.50	B300	Analyze issues related to settlements with Carrington and Rushmore.
10/28/22	R. Wicks	0.10	66.50	B300	Strategize with T. Moyron regarding confirmation hearing.
10/28/22	R. Richards	4.70	4,418.00	B300	Review further comments to confirmation order (0.6), harmonize comments and prepare cumulative markup of confirmation order (3.4), review balloting report as filed (0.2), review proposed plan amendments (0.2), review updated docket (0.3).

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Date	Timekeeper	Hours	Amount	Task	Narrative
10/29/22	R. Richards	5.30	4,982.00	B300	Review comments to Liquidating Trust Agreement (0.2); review comments from Greenburg to confirmation order (0.1); conference call with Dentons and Greenburg re confirmation order (0.5); conference call with Dentons and Pachulski re plan modifications (1.0); conference call with Dentons and Pachulski re modifications to Liquidating Trust Agreement (0.6); further revise confirmation order and internal emails regarding the same (1.0); review emails between Committee and DIP Cash Flow lenders counsel on possible changes to Liquidating Trust Agreement (0.2); review email from US Trustee re plan (0.1); review tax input on liquidating trust agreement comments (0.2); prepare point by point feedback to FTI on comments on Liquidating Trust Agreement (0.3); call with FTI and Moyron and Caloway re pending comments on Liquidating Trust Agreement (0.9); review proposed FTI engagement letter as Liquidating Trustee (0.2).
10/29/22	R. Wicks	1.30	864.50	B300	Revise amended Samples declaration in support of confirmation.
10/29/22	E. Smith	0.30	307.50	B300	Reviewed and prepared correspondence with Dentons team, T. Moyron, regarding scope of claim settlement with subservicer and status of claim settlement term sheets.
10/30/22	C. Montgomery	0.50	605.00	B300	Phone call L Smith re Mass Mutual EBO issue (.4); follow up communications with L. Smith re same (.1).
10/30/22	E. Smith	1.20	1,230.00	B300	Confer with T. Moyron regarding disputed claim settlements (.1); revised and distributed claim settlement term sheet to counsel for MSR rights purchaser (.9); confer with C. Montgomery regarding further revision of claim settlement term sheet with subservicer (.2).
10/30/22	R. Wicks	1.80	1,197.00	B300	Conduct research in preparation for confirmation hearing.
10/30/22	C. Doherty, Jr.	0.20	139.00	B300	Review updated plan documents filed over 10/29 and 10/30.

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Date	Timekeeper	Hours	Amount	Task	Narrative
10/30/22	R. Richards	3.10	2,914.00	B300	Emails regarding redlines of confirmation order (0.3); review further comments on Liquidating Trust Agreement (0.3); revise and circulate Liquidating Trust Agreement (1.0); review and comment on amended and restated Plan (0.4); review FTI engagement letter and fee schedule (0.3); call with Moyron re status (0.1), call with Eddie Mosier of FTI re changes to the Liquidating Trust Agreement (0.1); further revise and circulate Liquidating Trust Agreement (0.2); review further revised Liquidating Trust Agreement for filing (0.2); emails regarding final approvals and filing of same and cumulative redline against originally filed Liquidating Trust Agreement (0.2).
10/31/22	E. Smith	0.70	717.50	B300	Reviewed and prepared correspondence with counsel for counterparties and our co-counsel regarding final claim settlement term sheets to be filed with the Court (.7).
10/31/22	E. Smith	0.90	922.50	B300	Confer with C. Montgomery and L. Macksoud regarding revisions to form of confirmation order (.2); corresponded with counsel for MSR purchaser regarding results of confirmation hearing (.3); reviewed revised confirmation order draft (.4).
10/31/22	E. Smith	4.80	4,920.00	B300	Reviewed stipulation with loan purchaser and conferred with counsel for loan purchaser (.5); revised draft of claim settlement term sheet with subservicer based upon comments received from FGMC side (1.3); revised claim settlement term sheet with MSR purchaser (1.6); confer with C. Montgomery regarding revisions to amendment to cash flow DIP credit facility (.3); reviewed DIP loan amendment, motion for order and form of order approving such amendment (1.1).
10/31/22	R. Wicks	0.20	133.00	B300	Analyze qui tam issues prior to confirmation hearing.
10/31/22	R. Wicks	4.00	2,660.00	B300	Attend plan confirmation hearing and take notes.
10/31/22	C. Doherty, Jr.	0.10	69.50	B300	Calls with S. Alberts re confirmation hearing.

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Date	Timekeeper	Hours	Amount	Task	Narrative
10/31/22	C. Doherty, Jr.	0.80	556.00	B300	Prepare email memorandums re research questions for confirmation hearing.
10/31/22	C. Doherty, Jr.	0.30	208.50	B300	Review confirmation filings from 10/30 and 10/31.
10/31/22	R. Richards	1.00	940.00	B300	Review further comments on confirmation order (0.3); revise and circulate confirmation order (0.3); review updated docket (0.2); follow ups emails regarding additional comments to confirmation order (0.2).
Subtotal		140.20	119,724.00		

B310 - Claims Administration and Objections

Date	Timekeeper	Hours	Amount	Task	Narrative
10/07/22	S. Schrag	0.50	325.00	B310	Reoccurring call with J. John, T. Moyron, S. Maizel to discuss potential resolution with Planet (.3); confer with L. Macksoud regarding the same (.2).
10/09/22	S. Maizel	1.00	970.00	B310	Zoom conference with Shulte Roth, N. Peterman, etc. re FCA claims.
10/10/22	S. Schrag	0.10	65.00	B310	Voicemail from L. Macksoud regarding defective correspondent loans issue.
10/11/22	S. Maizel	1.50	1,455.00	B310	Call with FCA counsel, D. Oien and T. Moyron re FCA claim (.8); telephone conference with KCC re same (.2); zoom conference with PSZJ re same (.5).
10/13/22	S. Schrag	0.60	390.00	B310	Review correspondence from B. Fost regarding drawing down letter of credit (.2); confer with T. Moyron and T. Cairns regarding the same (.3); draft response (.1).
10/13/22	D. Cook	0.50	310.00	B310	Analyze Flagstar inquiry concerning admin claim bar deadline (.2); email communications with T Moyron and S Maizel concerning same (.2); draft email in response to same (.1).
10/13/22	G. Miller	1.50	1,155.00	B310	Call with FTI re DB cure amount (.3); calls with C. O'Leary, C. Montgomery, T. Moyron and T. Cairns re same (1.2).

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10/14/22	G. Miller	0.70	539.00	B310	Email DB re outstanding cure amount (.2); review prior correspondence re amounts owed to DB (.3); call with M. Boey re same (.2).
10/14/22	S. Maizel	0.80	776.00	B310	Telephone conference with T. Olack, D. Oien, etc. re FCA claims against estate.
10/15/22	S. Ruben	3.10	1,627.50	B310	Create chart of filed motions for administrative expense claims with analysis of each claim (3); correspond with T. Moyron re the same (.1).
10/15/22	S. Maizel	0.30	291.00	B310	Telephone conference with T. Moyron re FCA claims.
10/16/22	S. Maizel	0.60	582.00	B310	Zoom conference with D. Oien, etc. re FCA claims (.5); telephone conference with T. Moyron re same (.1).
10/16/22	S. Schrag	0.10	65.00	B310	Confer with T. Moyron regarding request from B. Rost regarding landlord claim.
10/17/22	S. Schrag	0.10	65.00	B310	Confer with B. Rost regarding landlord claim.
10/18/22	G. Miller	0.70	539.00	B310	Research re payment of prepetition claims of regulators and email M. Hyland re same.
10/18/22	G. Miller	0.10	77.00	B310	Call with M. Boey re cure amount re DB contracts.
10/18/22	S. Schrag	1.20	780.00	B310	Review correspondence from C. Neff regarding request for stipulation to admin expense (.2); review and analyze proof of claim and motion for admin expense (.4); conduct research regarding the same (.2); draft analysis of the same (.3); confer with C. Neff regarding evidence in support of claim (.1).
10/18/22	S. Maizel	0.50	485.00	B310	Telephone conference with Buckley, etc. re FCA claims issues.
10/19/22	S. Maizel	1.40	1,358.00	B310	Zoom conference with KCC re claims issues (0.4); telephone conference with FTI re priority claims issues (1.0).
10/19/22	S. Schrag	0.20	130.00	B310	Review correspondence regarding Texas Comptroller's amendment to proof of claim (.1); confer with S. Simpson of Texas AG's office regarding the same (.1).

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Date	Timekeeper	Hours	Amount	Task	Narrative
10/19/22	S. Schrag	0.20	130.00	B310	Participate in reoccurring call with J. John and S. Maizel to discuss, among other things, Texas Comptroller's claim.
10/19/22	G. Miller	0.40	308.00	B310	Emails re DB cure amount of post-confirmation contract for services.
10/19/22	S. Alberts	0.10	99.00	B310	Receive inquiry from Texas AG about tax claim issue and pass along inquiry.
10/19/22	S. Schrag	0.10	65.00	B310	Confer with S. Alberts regarding employee claims.
10/20/22	S. Ruben	1.80	945.00	B310	Revise spreadsheet of analysis of WARN Act claims with new claims filed (1.7); correspond with Dentons team re the same (.1).
10/20/22	G. Miller	0.30	231.00	B310	Call with M. Boey re DB cure dispute (.1); Call with C. Montgomery re same (.2).
10/21/22	G. Miller	1.80	1,386.00	B310	Draft stipulation with Deutsche Bank re cure amount.
10/21/22	G. Miller	0.30	231.00	B310	Calls with S. Maizel and T. Moyron re DB cure amount.
10/21/22	T. Moyron	1.30	1,027.00	B310	Conference call with Hunton, C. Montgomery, and L. Macksoud re Mass Mutual (.5); call with C. Montgomery and L. Macksoud re same (.8).
10/21/22	S. Schrag	0.20	130.00	B310	Review admin expense claim.
10/21/22	S. Schrag	0.30	195.00	B310	Confer with T. Moyron and S. Maizel on reoccurring call to discuss bids and cure list issues.
10/21/22	S. Ruben	2.40	1,260.00	B310	Conference with S. Alberts re analysis of WARN Act claims (.3); revise analysis of potential WARN Act Claims (1.9); analyze research on adversary proceedings and claims (.1); correspond with FTI re reserves for administrative and priority claims (.1).
10/23/22	S. Ruben	1.80	945.00	B310	Revise analysis and spreadsheet of potential WARN Act Claims (1.7); correspond with S. Alberts re findings (.1).

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10/24/22	S. Ruben	0.80	420.00	B310	Correspond with S. Alberts re analysis of WARN Act claims (.1); draft summary of analysis of WARN Act claims (.6); correspond with FTI re reserves for administrative and priority claims (.1).
10/24/22	G. Miller	0.10	77.00	B310	Follow up with J. John re Iron Mountain contracts.
10/25/22	S. Maizel	0.50	485.00	B310	Telephone conference with FTI, etc. re priority claims treatment.
10/25/22	S. Schrag	0.80	520.00	B310	Review and analyze correspondence from C. Neff, as well as landlord's underlying admin claim (.4); conduct research regarding the same (.4).
10/26/22	S. Maizel	0.50	485.00	B310	Telephone conference with D. Oien, J. Johns, etc. re pending issues.
10/26/22	S. Maizel	0.70	679.00	B310	Zoom conference with D. Oien, etc. re Qui Tam claim related issues (.5); review and respond to emails re same (.2).
10/26/22	G. Miller	0.30	231.00	B310	Calls and emails with M.Boey re DB cure amount.
10/26/22	G. Miller	0.50	385.00	B310	Review prior correspondence re DB offer to settle cure amount and emails with T. Moyron and J. John re same.
10/27/22	G. Miller	0.20	154.00	B310	Email J. John re payment of DB postpetition attorney's fees.
10/27/22	G. Miller	0.70	539.00	B310	Review entitlement to attorney's fees under DB agreements and email T. Moyron re same.
10/27/22	G. Miller	0.50	385.00	B310	Call S.Schrag re DB proposed cure amount with respect to sale (.2); emails with T. Moyron and M. Boey re same (.3).
10/28/22	G. Miller	0.80	616.00	B310	Calls with M. Boey and J. John re DB settlement (.3); Email T. Meerovich re same (.5).
10/29/22	G. Miller	1.20	924.00	B310	Review Rushmore settlement term sheet and email L. Smith and T. Moyron re same.
10/29/22	G. Miller	1.20	924.00	B310	Review Carrington settlement term sheet and email L. Smith and T. Moyron re same.
10/29/22	G. Miller	0.40	308.00	B310	Email M. Boey re counter offer to settle DB claim.

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10/29/22	L. Harrison	9.40	10,716.00	B310	Review email from T. Moyron regarding plan confirmation (.10); follow up regarding same (.10); telephone conversation with T. Moyron regarding Qui Tam objection to confirmation and related pleadings (.40); review confirmation brief arguments regarding Qui Tam claim (.40); review debtors' objection to Qui Tam claim for voting purposes only (.40); review UCC joinder to debtors' objection to Qui Tam claim for voting purposes (.40); review Crutcher response to debtors' objection claim for voting purposes (.30); review Crutcher confirmation objection (.30); collate list of issues raised by Crutcher pleadings in preparation for confirmation hearing (1.20); circulate list of issues to T. Moyron (.30); cursory review of liquidating trust agreement (.40); forward comments to trust agreement to T. Moyron and R. Richards regarding extension of duration of trust (.30); review email from T. Moyron regarding addressing 3018 argument (.20); review case law regarding 3018 factors in support of estimating claims (2.50); attend to draft arguments regarding same (1.50); follow up with T. Moyron regarding status of analysis (.60).
10/30/22	L. Harrison	6.70	7,638.00	B310	Revisit 3018 objection to Crutcher claim (.40); revisit opposition to 3018 objection (.30); review trilogy of Hawker Beecham opinions per instructions from T. Moyron (1.50); attend to summary of takeaways from Hawker Beecham opinions and potential arguments to raise regarding Crutcher claim (1.50); forward summary to T. Moyron (.30); telephone conversation with T. Moyron regarding Hawker Beecham and potential additional arguments regarding 3018 objection (.50); follow up with D. Cook regarding securing opinion for internal review (.30); review case law circulated by R. Wicks from 3018 objection and opposition (.80); confer with T. Moyron regarding additional theories in preparation for hearing on 3018 motion (.40); summarize additional argument regarding section 101(5) (.50); forward same to T. Moyron (.20).

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Date	Timekeeper	Hours	Amount	Task	Narrative
10/30/22	G. Miller	1.00	770.00	B310	Email M. Boey re DB counteroffer to settle claim dispute (.6); Email T. Meerovich re same (.4).
10/31/22	L. Harrison	5.20	5,928.00	B310	Confer with T. Moyron regarding status and possible additional arguments (.30); attend to review of additional arguments regarding 3018 (1.80); review article regarding estimation proceeding in other Delaware chapter 11 case (.30); review case law regarding same (2.40); confer with T. Moyron regarding court's decision to allow Crutcher claim at one dollar (.40).
Subtotal		58.00	51,120.50		

B320 - Plan and Disclosure Statement (incl. Business Plan)

Date	Timekeeper	Hours	Amount	Task	Narrative
10/01/22	S. Maizel	1.00	970.00	B320	Zoom conference with UCC counsel, PSZJ, etc. re plan issues (.5); telephone conferences with Dentons and PSZJ re plan and disclosure statement issues (.5).
10/01/22	C. Montgomery	4.30	5,203.00	B320	Continue drafting revisions to plan, including review of changes from Cash Flow DIP Lender (3.3); zoom call with S. Maizel, T. Moyron, D. Cook regarding Combined Plan and Disclosure Statement issues (.5); zoom call with E. Howe, T. Moyron and M. Indelicato and others regarding Plan and Disclosure Statement issues (.5).
10/01/22	D. Cook	1.00	620.00	B320	Call with Dentons professionals regarding incorporation of Committee settlement into combined plan/DS (.5); zoom conference with Debtor professionals, Committee professionals, and Cash Flow DIP Lender professionals in connection with same (.5).
10/03/22	C. Montgomery	2.30	2,783.00	B320	Communications with E. Howe, M. Indelicato and T. Moyron regarding changes to plan and review of same (2.3).

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Date	Timekeeper	Hours	Amount	Task	Narrative
10/04/22	C. Montgomery	4.80	5,808.00	B320	Communications with E. Howe, M. Indelicato and T. Moyron regarding changes to plan and disclosure statement (.4); review and comment upon additional committee changes (.7); phone call with T. Moyron regarding same (.1); phone call with D. Cook regarding same (.2); communications with R. Howe regarding same. (.1); phone call with L. Manning regarding accountant release issue (.2); communications with T. Moyron regarding same (.2); review update draft combined plan and Disclosure Statement and communications with D. Cook regarding same (2.6); phone call with E. Howe regarding same (.1); review S. Warren comments regarding same (.2).
10/04/22	D. Cook	4.10	2,542.00	B320	Call with C Montgomery regarding revised plan/DS incorporating UCC settlement (.1); revise same with respect to negotiated language from objecting parties (2.8); compile list of parties for dissemination of revised plan/DS ahead of filing (.7); email communications regarding same with Committee and Cash Flow DIP Lender (.2); email communications regarding same with objecting parties (.2); email communications regarding same with B Hackman (.1).
10/05/22	D. Cook	6.50	4,030.00	B320	Revise combined plan/DS with respect to description of financing facility (.6); analyze same with respect to inclusion of requested changes from objecting parties (3.1); revise plan/DS with respect to inclusion of requested changes from objecting parties (2.8).

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Date	Timekeeper	Hours	Amount	Task	Narrative
10/05/22	T. Moyron	2.40	1,896.00	B320	Conference calls with E. Howee re comments to plan (.2); conference call with D. Cook re status of DS and plan and pending comments (.3); conference calls with M. Caloway re DS order and proposed comment to DS and plan (.2); analyze emails from counsel for warehouse lenders and agencies regarding comments to DS and plan (.4), and analyze related issues (.3); conference call with C. Montgomery regarding outstanding comments to plan, quit tam motion, and other proposed matters to be addressed (.5); correspond with M. Indelicato and E. Howe re DS and plan (.3); correspond with M. Caloway re DS order (.2).
10/05/22	C. Montgomery	3.30	3,993.00	B320	Phone call with L. Manning regarding accountants release (.1); communications with T. Moyron regarding Fannie Mae requested language (.1); communications with T. Moyron regarding accountants release issues (.9); review Barclays comments to plan and communications with D. Cooke, M. Indelicato, and E. Howe additional requested changes to plan (1.7); phone call with T. Moyron regarding Qui Tam litigation and plan issues (.5).
10/06/22	C. Montgomery	1.10	1,331.00	B320	Communications with M. Power, T. Moyron and D. Cook regarding challenge period language (.1); phone call T. Moyron regarding B. Hackman inquiry (.1); communications with P. Moak, T. Moyron, E. Howe regarding various addition edits to plan (.2); communications with L. Manning regarding supplemental response UST questions (.1); communication with M. Power and M. Indelicato regarding committee support letter (.2); communications with D. Cook, C. Liu and J. Feldsher regarding Customers requested amendments to plan language (.4).

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10/06/22	D. Cook	4.60	2,852.00	B320	Analyze Freddie Mac comments to Plan/DS (.3); analysis with respect to proposed confirmation timeline with respect to same (.4); analyze comment from Flagstar with respect to released parties language (.3); analysis of order with respect to conformity to same (.3); revise plan/DS in preparation for filing (3.1); analysis with respect to status of Committee letter in support of plan (.2).
10/06/22	T. Moyron	0.40	316.00	B320	Call with L. Jones regarding pending matters, including matters related to plan.
10/06/22	T. Moyron	1.30	1,027.00	B320	Analyze updated DS and plan and redline (.4); correspondence regarding M. Caloway, D. Cook, et al., regarding updated DS and plan and order and filing thereof (.8); call with D. Cook re same (.1).
10/07/22	S. Maizel	0.70	679.00	B320	Zoom conference with A. Samples, D. Oien, etc. re Freddie Mac issues.
10/07/22	S. Maizel	2.00	1,940.00	B320	Conference call with PSZJ, etc. re plan and disclosure statement issues (1.0); zoom conference with Greenberg Traurig attorneys, etc. re same (1.0).
10/07/22	D. Cook	0.20	124.00	B320	Email communication with client regarding amended plan/DS.
10/07/22	T. Moyron	2.10	1,659.00	B320	Zoom meeting with PSZJ, including L. Jones, S. Maizel, C. Montgomery et al., re WARN, FCA, and plan matters (1.0); call with GT, including N. Peterman, S. Maizel, et al., regarding same (1.1).
10/07/22	T. Moyron	0.40	316.00	B320	Conference call with T. Meerovich re pending matters and wind-down.
10/07/22	C. Montgomery	2.30	2,783.00	B320	Zoom call with L. Jones, T. Moyron, T. Cairns regarding open plan issues to resolved before confirmation (1.0); zoom call with Cash Flow DIP Lender counsel regarding plan risk issues and funding including N. Peterman, T. Moyron, T. Cairns (1.3).
10/09/22	D. Cook	0.80	496.00	B320	Analyze plan/DS against notices of non-voting to verify current status of release provisions in connection with T Moyron email.

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Date	Timekeeper	Hours	Amount	Task	Narrative
10/11/22	T. Moyron	1.00	790.00	B320	Zoom meeting with Dentons and PSZJ, including L. Jones, S. Maizel, R. Richards, et al., regarding qui tam, and motion for relief from stay and response thereto, and plan matters.
10/11/22	T. Moyron	0.40	316.00	B320	Analyze post-confirmation budget and trust requirements.
10/11/22	T. Moyron	0.10	79.00	B320	Correspond with T. Meerovich re plan supplement.
10/11/22	T. Moyron	1.00	790.00	B320	Conference call with L. Macksoud, C. Montgomery, and L. Macksoud regarding wind-down budget and Trust matters.
10/11/22	T. Moyron	0.20	158.00	B320	Conference call with T. Cairns re plan supplement, Qui Tam, and related matters.
10/11/22	C. Montgomery	1.70	2,057.00	B320	Communications with T. Moyron regarding Crutcher voting claim (.3); communications with L. Macksoud regarding post effective date budget (.4); zoom call with L. Jones, T. Moyron, S. Maizel regarding Crutcher claim and voting issues (1.0).
10/11/22	T. Moyron	0.60	474.00	B320	Correspondence with D. Oien, N. Peterman, M. Harris, et al. regarding pending issues.
10/12/22	C. Montgomery	0.30	363.00	B320	Communications with L. Macksoud and T. Moyron regarding effective date timing and liquidating trust issues.
10/12/22	T. Moyron	0.80	632.00	B320	Zoom meeting with C. Montgomery, L. Macksoud and S. Maizel regarding liquidating trust matters.
10/12/22	S. Maizel	0.80	776.00	B320	Telephone conference with C. Montgomery, T. Moyron, etc. re confirmation issues.
10/13/22	S. Maizel	0.30	291.00	B320	Zoom conference with D. Oien, etc. re retained causes of action under the plan.
10/13/22	S. Maizel	1.00	970.00	B320	Zoom conference re plan confirmation issues with A. Samples, etc.
10/13/22	S. Maizel	0.50	485.00	B320	Zoom conference with T. Meerovich, etc. re pipeline funding costs, etc.
10/13/22	S. Maizel	0.80	776.00	B320	Zoom conference with M. Schwarzmman, etc. re Bravo funding issues.
10/13/22	D. Cook	0.30	186.00	B320	Email communications with G Miller regarding confirmation brief.

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10/13/22	T. Moyron	1.00	790.00	B320	Call with J. John, L. Macksoud, et al., re retained causes of action (.2); attention to matters related to confirmation brief, declaration and order (.6); correspond with L. Jones re qui tam (.1) and analyze related emails from C. Montgomery, et al., (.1).
10/13/22	C. Montgomery	0.60	726.00	B320	Communications with T. Moyron and C. O'Leary regarding class 4 candidates (.1); participate in teams call regarding class 4 resolutions including T. Meerovich, A. Samples, L. Manny (.5).
10/13/22	G. Medina	0.70	252.00	B320	Call with T. Moyron and review supplements filed in verity related to cure schedule file with executory contracts related to plan supplement.
10/13/22	S. Ruben	0.90	472.50	B320	Correspond with T. Moyron and G. Miller re preparing brief in support of confirmation (.1); conference with G. Miller re the same (.2); analyze plan and disclosure statement (.4); conference with Julie John and Dentons team re plan supplement and retained causes of action (.2).
10/14/22	S. Maizel	1.60	1,552.00	B320	Telephone conference with PSZJ, etc. re plan confirmation issues (.4); multiple telephone conference with T. Moyron re same (.8); review and respond to emails re plan confirmation issues (.4).
10/14/22	D. Cook	0.20	124.00	B320	Email communications with T Moyron regarding liquidating trust agreement.
10/14/22	S. Ruben	0.80	420.00	B320	Correspond with Julie John and Dentons team re retained causes of action (.1); analyze plan and disclosure statement in preparation for drafting confirmation brief (.7).
10/14/22	C. Montgomery	1.30	1,573.00	B320	Participate in Cash Flow lender zoom call regarding plan matters with T. Moyron, L. Jones, N. Peterman and others (.7); follow up call with Debtors' counsel only, including T. Moyron, L. Jones and others (.5); communications from L Lerman regarding government language request (.1).

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10/14/22	T. Moyron	0.70	553.00	B320	Analyze notices and related administrative expense claims filed against Debtors, including claims filed by Flagstar, FNMA and other parties.
10/14/22	L. Macksoud	3.20	2,464.00	B320	Draft relevant sections of plan supplement, including with respect to retained causes of action and assumed executory contracts (1.2), review lists of same (.4) and confer with client and FTI re list of same (.6), confer with PSZJ re finalizing and filing plan supplement (.3), participate in priority items call with working group (.7).
10/14/22	T. Moyron	1.10	869.00	B320	Analyze and prepare comment to list of retained causes of action re plan supplement (.2); exchange emails with J. John re same (.2); exchange emails with T. Meerovich regarding list of assumed contracts re plan supplement (.1); analyze LT agreement (.2); correspond with R. Richards, et al., re LT (.2); correspond with M. Caloway (.1) and T. Meerovich re LT (.1) re LT and plan supplement.
10/14/22	T. Moyron	3.80	3,002.00	B320	Call with FGMC, FTI, and Dentons, including T. Meerovich, A. Samples, et al. regarding plan matters, warehouse lenders, and other matters (.9); correspond with J. John, FTI, et al., regarding list of contracts and timing (.3); correspond with M. Caloway regarding list and supplement (.3); analyze plan supplement filing and cover sheets and correspond with L. Macksoud, et al., re same (.4); analyze FTI comments to Liquidating Trust Agreement (.6); correspond with FTI re Liquidating Trust Agreement (.2); call with GT regarding plan matters (.6); follow up call with L. Jones, et al., re plan matters (.5).
10/14/22	S. Schrag	0.10	65.00	B320	Confer with L. Macksoud regarding Plan Supplement and Retained Causes of Action.
10/15/22	S. Ruben	0.30	157.50	B320	Analyze plan and disclosure statement in preparation for drafting confirmation brief (.3).
10/16/22	S. Maizel	0.50	485.00	B320	Zoom conference re Rushmore issues.
10/17/22	S. Maizel	1.50	1,455.00	B320	Zoom conference with T. Meerovich, etc. re wind-down budget, etc.

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10/17/22	S. Maizel	0.70	679.00	B320	Review and revise objection to qui tam based claim for voting purposes.
10/17/22	S. Ruben	4.50	2,362.50	B320	Correspond with G. Miller re preparing brief in support of confirmation (.1); draft the same (4.3); correspond with T. Moyron and G. Miller re issues related to confirmation brief (.1).
10/17/22	T. Moyron	0.50	395.00	B320	Call with FTI, including T. Meerovich, et al., and M. Caloway regarding LT Agreement.
10/17/22	T. Moyron	0.50	395.00	B320	Conference call with T. Meerovich, M. Caloway, et al., regarding Liquidating Trust Agreement.
10/17/22	T. Moyron	0.90	711.00	B320	Correspond with M. Jacobson, A. Samples, et al., regarding Rushmore proposal (.2); analyze settlement proposal and call with Rushmore regarding same (.5).
10/17/22	T. Moyron	0.60	474.00	B320	Attend to confirmation brief, declaration, and order, and correspond with Dentons, including L. Macksoud, G. Miller, et al.
10/17/22	T. Moyron	0.50	395.00	B320	Analyze issues related to administrative expenses asserts and list of same and potential reserves and related document (.4); prepare email to T. Meerovich, et al., re same (.1).
10/17/22	T. Moyron	0.50	395.00	B320	Analyze wind-down list (.2); correspond with L. Macksoud re same (.1); correspond with FTI re same (.2).
10/18/22	L. Macksoud	5.40	4,158.00	B320	Review various claims and question from KCC re placement of same (1.8), confer with C. Montgomery re same (.2) review updated filing by TIAA re servicing agreements (.4), call with C. Montgomery re same (.3) and further revise draft objection to motion to compel (1.7), call with Dentons working group re amendment to DIP agreement (.4), review email from Planet Home's counsel re rejection of contracts and review zip file of additional contracts between Planet Home and FGMC (.5), draft email to working group re same (.1).
10/18/22	S. Ruben	4.30	2,257.50	B320	Draft brief in support of confirmation (4.2); correspond with G. Miller re draft confirmation brief and further issues (.1).

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10/18/22	C. Montgomery	0.60	726.00	B320	Communications with T. Moyron regarding UMB voting.
10/19/22	G. Medina	0.60	216.00	B320	Received request from L. Macksoud to obtain declaration filed in Verity in support of confirmation (0.1); reviewed docket, pleadings and retrieve/send memorandum of law in support of confirmation (0.5).
10/19/22	T. Moyron	0.40	316.00	B320	Analyze and prepare comments to T. Meerovich Declaration.
10/19/22	T. Moyron	0.70	553.00	B320	Finalize review of wind-down materials and prepare comments thereto.
10/19/22	T. Moyron	0.40	316.00	B320	Analyze email from Committee counsel re voting inquiry (.1); correspond with KCC and T. Cairns re same (.2), and call with T. Cairns re same (.1).
10/19/22	T. Moyron	1.50	1,185.00	B320	Analyze wind-down materials and prepare comments thereto (1.4); prepare email to T. Meerovich, et al., re same (.1).
10/19/22	L. Macksoud	8.40	6,468.00	B320	Call with C. Montgomery to discuss response to KCC re claim placement and to discuss TIAA objection (.4), draft email to KCC in respond to request for claim designations and further respond to questions on balloting of claims (.8), various calls and emails with T. Moyron, S. Maizel, counsel for the DIP Lenders and PSZJ re draft TIAA objection, further revise same per comments received and finalize and file same (2.8), call with Dentons and FTI working groups re priority items list and discussion of administrative and priority claims (1.0), review email from US Trustee with comments on plan, review plan language and draft responses thereto (2.3), continue drafting declaration in support of confirmation and circulate draft to working group (.6), review Planet Home proof of claim and draft emails to C. O'Leary and FTI re same (.5).
10/19/22	S. Ruben	0.40	210.00	B320	Correspond with T. Moyron re draft confirmation brief and further issues (.1); further revise confirmation brief (.2); analyze Meerovich Declaration in Support of Confirmation (.1).

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Date	Timekeeper	Hours	Amount	Task	Narrative
10/20/22	L. Macksoud	1.90	1,463.00	B320	Further revise draft declaration in support of confirmation per comments from T. Moyron (.4), review FTI's responses on questions from UST and confer with FTI re same (.4), confer with counsel to Lakeview re asset recovery (.2), review holdback spreadsheet and emails with C. O'Leary, FTI and FGMC re analysis of Planet Home claim (.9).
10/20/22	T. Moyron	1.20	948.00	B320	Analyze matters related to TIAA, asserted administrative claims, and potential settlements with various counterparties.
10/20/22	T. Moyron	0.10	79.00	B320	Prepare email regarding call with GT, et al., re wind-down materials.
10/20/22	T. Moyron	0.20	158.00	B320	Call with T. Meerovich re GT questions related to wind-down and sale matters.
10/20/22	T. Moyron	1.00	790.00	B320	Call with N. Peterman, M. Schwarzmnn, N. Peterman, et al., regarding WARN, plan, Qui Tam, and other matters.
10/20/22	S. Ruben	0.10	52.50	B320	Analyze draft confirmation order (.1).
10/20/22	S. Maizel	0.30	291.00	B320	Teams conference with Bravo, GT, etc. re confirmation related issues.
10/21/22	S. Maizel	1.50	1,455.00	B320	Conference with M. Schwarzmnn, etc. re plan confirmation issues (1.3); telephone conference with M. Schwarzmnn re same (.2).
10/21/22	T. Moyron	1.20	948.00	B320	Conference call with N. Peterman, M. Schwarzmnn, T. Meerovich, S. Maizel, et al., regarding wind-down budget.
10/21/22	L. Macksoud	4.00	3,080.00	B320	Review Lakeview POC and correspondence with FTI and client on claim (.5), confer with counsel to Lakeview re possible settlement (.5), call with C. O'Leary re Planet Home agreements (.4) draft email to working group with analysis of same (.3), review FTI comments on questions received from US Trustee and collate response to same (.5), call with J. John re amendments to schedules (.3), call with FTI to discuss asset recoveries (.6), call with counsel to MassMutual to discuss proposed stipulation (.6), follow up with C. Montgomery and T. Moyron re same (.3).

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10/22/22	S. Maize1	0.90	873.00	B320	Telephone conference with T. Moyron, etc. re Mass Mutual issues.
10/23/22	S. Maize1	0.50	485.00	B320	Zoom conference with T. Moyron, C. Montgomery, etc. re Mass. Mutual issues.
10/23/22	S. Ruben	0.10	52.50	B320	Correspond with T. Moyron re confirmation brief draft and deadlines (.1).
10/24/22	S. Alberts	6.90	6,831.00	B320	Respond to T. Moyron about Plan insert regarding WARN (.1); contact S. McCandless seeking WARN exception information for Plan insert regarding WARN (.1) and follow up request (.1); receive and respond to T. Moyron inquiry concerning factual issues (.1), receive response from T. Moyron regarding WARN response (.1); receive materials from S. McCandless, review and respond (.2); and follow up inquiry from T. Moyron and respond (.1); request C. Doherty to provide elements of WARN exceptions (.1), receive and consider (.2); request (.1) and receive and review first day declaration and other background materials (e.g., WARN complaints) in preparation of WARN Insert (.8) draft insert (4.4) and circulate for internal review and addition of citations (.1), receive and review proposed revisions (.2), made follow up inquiry (.2).
10/24/22	S. Maize1	0.30	291.00	B320	Review and respond to emails re TIAA issues.
10/24/22	S. Maize1	2.10	2,037.00	B320	Telephone conference with C. Montgomery, etc. re Mass Mutual issues (.5); zoom conference with FTI, etc. re Mass Mutual issues (.5); telephone conference with T. Moyron re Mass Mutual issues (.2); telephone conference with FTI, etc. re Mass Mutual issues (.5); review and respond to emails re Mass Mutual issues (.4).
10/24/22	T. Moyron	1.80	1,422.00	B320	Analyze and prepare comments to confirmation brief (1.3); analyze related issues (.4); prepare email to PSZJ, including L. Jones re confirmation (.1).

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10/24/22	D. Cook	0.30	186.00	B320	Email communications with S Alberts and PSZJ regarding first day declaration in connection with WARN dispute (.2); analysis in connection with same (.1).
10/24/22	K.M. Howard	0.10	34.00	B320	Email exchange with S. Maizel regarding confirmation hearing.
10/24/22	K.M. Howard	0.40	136.00	B320	Review email from S. Maizel regarding hearing on confirmation of plan (.1); prepare response thereto (.1); email exchanges with T. Moyron regarding same (.1); prepare followup emails to S. Maizel regarding same (.1).
10/25/22	S. Maizel	0.70	679.00	B320	Telephone conference with S. Alberts, etc. re WARN Act issues related to confirmation.
10/25/22	S. Maizel	0.50	485.00	B320	Telephone conference with FTI, etc. re WARN Act claims.
10/25/22	K.M. Howard	0.10	34.00	B320	Email exchange with S. Maizel regarding confirmation hearing.
10/25/22	S. Maizel	0.30	291.00	B320	Review and respond to emails re confirmation brief.
10/25/22	C. Montgomery	0.10	121.00	B320	Outline tasks to be accomplished by confirmation (.1); communications with R. Richards, L. Lerner.
10/25/22	C. Montgomery	0.70	847.00	B320	Communications with R. Rixhards, T. Moyron regarding confirmation order (.2); participate in Zoom call with L. Lerman regarding DOJ language for confirmation order (.5).
10/25/22	T. Moyron	0.30	237.00	B320	Correspond with counsel at DOJ re confirmation order (.1); correspond with R. Richards and PSZJ re GNMA proposed insert (.2).
10/25/22	T. Moyron	0.40	316.00	B320	Analyze emails from KCC re voting and plan matters (.2); call with M. Caloway re Liberty Mutual (.2).

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10/25/22	T. Moyron	2.70	2,133.00	B320	Correspond with KCC, et al., regarding various matters, including FNMA, Customers, etc. (.6); analyze matters related to confirmation order and coordinate next steps, including various inserts from agencies and related matters (.8); attention to updated confirmation brief (.6); analyze matters related to updated declaration and coordinate next steps with Dentons internal and review related emails (.7).
10/25/22	T. Moyron	0.20	158.00	B320	Conference call with T. Cairns re pending issues regarding plan.
10/25/22	S. Ruben	3.30	1,732.50	B320	Revise confirmation brief re T. Moyron comments (3); correspond with C. Montgomery re questions on confirmation brief (.1); correspond with A. Estrada of KCC re service of solicitation materials for insert into confirmation brief (.1); correspond with S. Maizel re governmental regulatory question for insert into confirmation brief (.1).
10/25/22	S. Alberts	6.80	6,732.00	B320	Review Answer and respond to T. Moyron about affirmative defenses (.1), receive and review communication from S. McCandless about WARN defenses (.1) and respond (.1) receive and review communication from C. Doherty about WARN claim reserve (.1) and respond (.1), confer with S. McCandless and C. Doherty about WARN insert and defenses (.5), summarize call and send with question to T. Moyron (.3) and receive response from T. Moyron (.1) send questions rot client relevant to WARN (.2), receive response (.1) and follow ups with client (.2), send questions concerning June 24 RIF to FTI (.1) and follow up with FTI (.1), review, revise and expand Plan insert (4.7).

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10/25/22	L. Macksoud	6.70	5,159.00	B320	Calls and emails with working group to discuss administrative and priority claims (1.5), further draft declaration in support of plan to address such claims (.9), call with counsel to TIAA re potential resolution of claim (.5), call with counsel to Lakeview re potential resolution of claim (.4), calls and emails with FTI and counsel to MassMutual resolution of language for stipulation (1.2), review review additional proofs of claim filed by various claimants and participate in calls and emails with working group re settlement/ resolution of same (2.2).
10/26/22	T. Moyron	4.90	3,871.00	B320	Analyze objections to plan, including FNMA, Krutcher, etc. (.6); correspond regarding Krutcher's limited objection (.2); analyze emails from KCC re voting and other matters (.3); prepare email to KCC (.1); coordinate replies to objection and analyze matters related to confirmation brief, including emails with G. Miller, PSZJ, et al. (2.2); analyze budget and related matters (.8); analyze excel sheets and admin/priority claims and reserves (.7).
10/26/22	T. Moyron	0.60	474.00	B320	Conference calls with T. Meerovich regarding wind-down and budget (.4); call with T. Meerovich prior to call with lender re wind-down (.2).

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Date	Timekeeper	Hours	Amount	Task	Narrative
10/26/22	S. Alberts	10.50	10,395.00	B320	Review claims register to assess WARN issues (.3), draft and send email to S. McCandless about Buckley Plaintiffs call and potential issues arising therefrom (.2), contact R. Wicks about needed WARN related research by email (.1) and phone (.2), conference with T. Moyron about WARN claim issues in preparation of conference with lenders (.5), conference with lenders and working group about WARN calls (.8) review certain cases cited in insert and Samples Declaration and Meerovich declaration to establish timeline and confirm facts for insert (1.7); request to FTI and receive and review actual copy of WARN notice (.2); request and receive from FTI number of severance recipients (.1), revise and expand WARN insert for confirmation brief and reply (5.7); review Buckley Plaintiffs objection to confirmation and incorporate in insert (.4); circulate Insert to S. Maizel and T. Moyron (.1) conference with T. Moyron about WARN insert (.2).
10/26/22	T. Moyron	0.80	632.00	B320	Conference call with PSZJ, FTI, and Dentons, including S. Maizel, L. Jones, T. Meerovich, et al., re wind-down budget, anticipated recoveries and other matters.
10/26/22	T. Moyron	1.40	1,106.00	B320	Conference call with N. Peterman, M. Schwarmann, L. Jones, T. Meerovich, C. Montgomery, et al., re budget (1.1); follow up call with L. Jones and C. Montgomery re same (.3).
10/26/22	S. Ruben	0.70	367.50	B320	Correspond with T. Moyron, S. Maizel, and L. Macksoud re inserting citations to declarations in confirmation brief (.1); draft summary of objections to confirmation (.1); review Meerovich declaration in support of confirmation (.1); insert citations to declaration into confirmation brief (.4).

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Date	Timekeeper	Hours	Amount	Task	Narrative
10/26/22	L. Macksoud	3.80	2,926.00	B320	Call with counsel for Planet Home to discuss possible settlement construct (.4), cal with KCC to discuss ballot issue (.5), call with FTI and FGMC to discuss voting, objections and settlement recoveries (1.0), call with working group to discuss confirmation strategy and wind down budget (.7), various calls and emails to discuss admin and priority claim pool (.8) and to discuss voting results (.4).
10/26/22	D. Cook	5.30	3,286.00	B320	Zoom call with Dentons, lender, lender counsel, FTI, and PSZJ regarding WARN issues (1.0); research regarding effect of conversion on releases (2.1); draft email memorandum for T Moyron review regarding same (.3); draft list of plan issues requiring response (.7); zoom conference with Dentons, FTI, PSZJ, lender counsel, and lender regarding Effective Date funding (1.2).
10/26/22	G. Medina	0.60	216.00	B320	Retrieve and send objections to confirmation filed per the request of T. Moyron.
10/26/22	S. Maizel	1.00	970.00	B320	Zoom conference with M. Schwarzmman, etc. budget for confirmation.
10/26/22	C. Montgomery	0.40	484.00	B320	Communications with R. Richards, T. Moyron and others regarding plan confirmation language changes (.3); communications with E. Schnabel regarding Customers Bank confirmation order requests (.1).
10/27/22	C. Montgomery	8.00	9,680.00	B320	Review and draft reply to objection to confirmation by Customers Bank (3.4); communications with R. Richarfs regarding exclusion of insider votes (.1); continued preparation of response to Customers (1.4) review Flagstar insert (1.5)and comments to L. Macksoud (.1); communications with R. Richards regarding additional language for confirmation order regarding TIAA and Customers (.1); communications with j. Huston rwgarding TIAA resolution (.1); participate in Zoom call regarding Meerovich Declaration ISo Plan confirmation (1.0); communications with S. Ruben regarding confirmation brief questions (.3).

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Date	Timekeeper	Hours	Amount	Task	Narrative
10/27/22	S. Maizel	1.50	1,455.00	B320	Telephone conference with UCC representatives, etc. re plan confirmation issues (.5); zoom conference with GT, etc. re plan funding issues (.5); review and respond to emails re plan confirmation issues (.5).
10/27/22	G. Medina	1.50	540.00	B320	Prepare per the request of T. Moyron binder with the combined plan and supplement and the Plan objections (1.1); review and deliver binders to T. Moyron (0.4).
10/27/22	D. Cook	10.70	6,634.00	B320	Prepare WARN section of confirmation brief (.9); telephone conference with T Moyron regarding plan workstreams (.2); draft workstreams list (.7); revise same (.4); analyze LWLA confirmation objection in order to respond to same (.7); draft response to LWLA confirmation objection (.3); zoom conference with board of directors regarding confirmation (1.1); circulate synopsis of same to Dentons team (.1); analyze UST confirmation objection in order to respond to same (.7); zoom conference with T Moyron, S Ruben, and PSZJ regarding UST confirmation objection (.7); follow up call with T Moyron regarding same (.1); additional follow up call with T Moyron regarding same (.1); draft response to UST confirmation objection (4.4); revise same (.2); email correspondence with R Richards regarding quarterly fee/reporting language in confirmation order (.1).
10/27/22	L. Macksoud	5.20	4,004.00	B320	Review Customers and Flagstar's objections filed to plan confirmation and draft objections thereto (2.2), confer with C. Montgomery re same (.4), call with T. Moyron, C. Montgomery and S. Ruben to discuss same and declaration in support of confirmation (1.4), review voting declaration and support therefore (.4) and further draft and revise Meerovich Declaration in support of confirmation (.5), review revisions to draft confirmation order and confer with DIP lender re same (.3).

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Date	Timekeeper	Hours	Amount	Task	Narrative
10/27/22	S. Alberts	6.00	5,940.00	B320	Review UST Objection to confirmation and others objects with attention to WARN claim issues (.4); receive question by C. Doherty about Wolter POC and respond (.1); revise WARN insert to incorporate objects to confirmation based upon WARN issues and other related changes (4.3), send to D. Cook for proof (.1) and conference with R. Wicks about further cite checking (.1) receive and review cite checked brief (.2) and made further comments (.1), draft A. Samples Declaration (.4), Conference with T. Moyron about A. Sample declaration (.2) and circulate (.1).
10/27/22	T. Moyron	0.70	553.00	B320	Conference call with PSZJ, S. Ruben, and D. Cook re confirmation brief/reply, and confirmation order.
10/27/22	T. Moyron	0.60	474.00	B320	Prepare emails to L. Smith, et al., regarding settlement agreements (.2); analyze L. Smith, et al., correspondence regarding settlement agreement, terms, and calls (.4).
10/27/22	T. Moyron	1.00	790.00	B320	Participate in Zoom meeting with L. Macksoud, C. Montgomery, and S. Ruben re T. Meerovich declaration, budget, and other items.
10/27/22	T. Moyron	6.50	5,135.00	B320	Analyze and prepare confirmation brief, including replies to objections (5.7); analyze objections, plan and related issues (.8).
10/27/22	T. Moyron	0.90	711.00	B320	Conference call with Committee Counsel M. Power and M. Indelicato regarding sale, plan, and MassMutual.
10/27/22	T. Moyron	0.70	553.00	B320	Analyze UST objection and other issues related to replies and confirmation brief (.4); prepare memo re same (.2); correspond with D. Cook re same (.1).
10/28/22	T. Moyron	1.10	869.00	B320	Conference call with FTI and Dentons, including T. Meerovich, S. Maizel, et al., regarding declaration in support of brief.
10/28/22	T. Moyron	0.70	553.00	B320	Conference call with E. Slight re USA and IRS language re confirmation order (.3); conference call with M. Power re same (.1); correspond with L. Lerman, N. Peterman, et al. re same (.3).

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10/28/22	T. Moyron	0.70	553.00	B320	Conference call with S. Maizel and L. Jones re confirmation hearing, outstanding issues, and related matters.
10/28/22	L. Macksoud	4.90	3,773.00	B320	Review and comment on draft confirmation brief (.9), calls and emails with T. Moyron and S. Ruben re same (.6) and draft insert on tabulation of voting (.5), calls and emails with FTI and Dentons team to discuss Meerovich declaration (1.2) and revise declaration per comments from FTI (.5), call with FTI to discuss request by Cash Flow DIP Lender (.5), review comments and revisions to confirmation order (.4) and confer with R. Richards re same (.3).
10/28/22	D. Cook	6.30	3,906.00	B320	Zoom conference with FTI regarding confirmation materials (.5); analyze confirmation brief in its entirety for needed revisions (2.3); revise same (.4); analyze UST response with respect to same (1.8); revise same (.3); analyze LWLA response with respect to same (.3); email communications with Dentons team regarding previously filed declarations in support of confirmation brief (.2); telephone conference with T Moyron regarding confirmation brief (.1); follow up telephone call regarding same (.1); email correspondence with T Moyron regarding post-confirmation employee issue (.1); analyze email communications from LWLA regarding potential resolution (.2).
10/28/22	T. Moyron	0.70	553.00	B320	Teams Priority Call with FTI, Dentons, FGMC, et al., including A. Samples, T. Meerovich, et al. re confirmation brief, settlements and other matters.
10/28/22	T. Moyron	0.70	553.00	B320	Analyze updated T. Meerovich declaration and redline (.2); correspond with T. Meerovich regarding declaration (.1); analyze emails from FTI, L. Macksoud, et al., re Meerovich declaration (.4).

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10/28/22	T. Moyron	5.60	4,424.00	B320	Analyze, prepare and finalize confirmation brief (4.7), correspond with L. Macksoud regarding Class 3 (.2), and call with T. Cairns re Class 4 (.1); analyze comments from GT to confirmation brief (.2); exchange emails with GT re confirmation brief (.2); conference calls with S. Ruben re confirmation brief (.2).
10/28/22	T. Moyron	0.90	711.00	B320	Analyze GT comments to LT (.6); correspond internally at Dentons, including with R. Richards, et al., regarding GT comments (.2); correspond with T. Meerovich regarding LT and timing (.1).
10/28/22	T. Moyron	1.00	790.00	B320	Analyze emails from N. Peterman, et al., re LT Agreement (.2); prepare email to R. Richards, et al., re LT Agreement (.2); initial review of plan modification comments from GT (.3); prepare email to S. Maizel, et al. re same (.1); analyze email from E. Moser attaching FTI comments to LT Agreement (.2).
10/28/22	T. Moyron	0.40	316.00	B320	Conference call with T. Meerovich and M. Hyland re LWLA.
10/28/22	T. Moyron	0.40	316.00	B320	Analyze FTI comments to LT Agreement (.2); analyze Committee language to LT Agreement (.2).
10/28/22	S. Maizel	3.60	3,492.00	B320	Telephone conference with T. Meerovich, T. Moyron, etc. re plan confirmation issues (1.0); telephone conference with T. Moyron re same (.1); telephone conference with L. Jones, etc. re confirmation issues (.7); telephone conference with N. Peterman, etc. re plan confirmation issues (.3); zoom conference with PSZJ, etc. re plan confirmation issues (.5); zoom conference with T. Moyron, N. Peterman, etc. re funding for plan confirmation (.5); review and respond to emails re plan confirmation issues (.5).

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Date	Timekeeper	Hours	Amount	Task	Narrative
10/28/22	S. Ruben	7.50	3,937.50	B320	Prepare confirmation brief (.6); correspond with Dentons team, FTI team, and Pachulski team re draft confirmation brief (.1); analyze FTI's proposed changes and comments to Meerovich declaration (.1); conference with T. Meerovich, Dentons team and FTI re Meerovich declaration (1); further revise confirmation brief re comments from Pachulski, Greenberg Traurig, and Dentons (3); conference with L. Macksoud re voting results (.1); further finalize brief in preparation (2.2); correspond with S. Alberts and T. Moyron re WARN Act claimant issues (.2); correspond with M. Caloway re motion to exceed page limit for confirmation brief (.1); correspond with S. Alberts re revisions to Samples Declaration (.1).
10/28/22	T. Moyron	0.40	316.00	B320	Analyze settlements with Rushmore and Carrington (.2); correspond with L. Smith, et al., re same (.2).
10/28/22	S. Schrag	0.30	195.00	B320	Confer with D. Oien, T. Moyron, S. Maizel in reoccurring call to discuss finalizing filings in preparation for confirmation hearing.
10/28/22	S. Schrag	1.10	715.00	B320	Confer with T. Moyron and S. Alberts regarding minutes and notes from with Board in support of confirmation brief and declaration (.3); review and analyze the same (.6); confer with T. Moyron regarding the same (.2).
10/28/22	S. Alberts	5.50	5,445.00	B320	Email about confirmation brief (.1), review C. Doherty comments to WARN reply and overlay additional comments (.4) and circulate (.1). communicate about need for call with Greenberg (.1), Conference with Greenberg and working group (.5), revise reply to incorporate comments (1.3), forward to company for review (.1), communicate with A. Samples about declaration (.2) and revise declaration (.3), receive comments and revise reply and Declaration of Staples and filing thereof (2.4).
10/29/22	S. Alberts	0.90	891.00	B320	Review final filed brief (.4), communications about revising Reply via errata to brief and to A. Staples declaration (.5).

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10/29/22	D. Cook	3.70	2,294.00	B320	Analyze Crutcher pleadings at request of T. Moyron in preparation for confirmation hearing (.6); revise section 14.4 of Plan (.1); zoom conference with Dentons/PSZJ regarding lender comments to plan materials (1.1); zoom conference with FTI, Dentons, and PSZJ regarding plan modifications (1.0); analyze UST proposed language in confirmation materials to resolve objection (.8); telephone conference with T. Moyron regarding same (.1).
10/29/22	S. Maizel	2.20	2,134.00	B320	Zoom conference with T. Moyron, etc. re confirmation order (.6); zoom conference with GT, FTI, etc. re modifications to combined plan and disclosure statement (1.0); review and respond to emails re confirmation issues (.6).
10/29/22	T. Moyron	1.00	790.00	B320	Conference call with N. Peterman and E. Howe re confirmation order and other confirmation matters.
10/29/22	C. Montgomery	3.90	4,719.00	B320	Prepare for confirmation hearing (.5) and zoom call with Dentons and Greenberg re same (.6); zoom call with PSZJ and Dentons re same (.5); zoom call with FTI and Dentons re plan issues (1.0); follow up communication with T. Moyron re return of excess DIP funding (.4); phone call with T. Moyron regarding plan requirement to return excwss DIP borrowing (.4); communications with M. Power regarding plan issues (.1); communications with T. Moyron regarding LWLA (.1); communications with B. Hackman and T. Moyron regarding open UST issues (.1); review Wind down cost summary (.2).
10/29/22	G. Medina	0.70	252.00	B320	Review docket and retrieve pleadings filed on October 10, 2022 in connection with confirmation and send to clients, T. Moyron, S. Maizel, C. Montgomery and L. Macksoud per the request of T. Moyron (0.7).

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10/29/22	L. Macksoud	3.20	2,464.00	B320	Review comments on plan (.5), call with Dentons and PSZJ to discuss various plan comments (1.0), call with FTI to discuss same (.8), review objection and various proofs of claim filed by Lynx and emails with T. Moyron re same (.7), confer with R. Richards re cram down language in confirmation order (.2).
10/29/22	T. Moyron	3.30	2,607.00	B320	Conference call with M. Caloway, R. Richards, T. Meerovich, and E. Moser re LT agreement (.8); zoom meeting with T. Cairns, M. Caloway, C. Montgomery, et al., re confirmation order and plan modifications (1.0); zoom meeting regarding LT changes with M. Caloway, T. Cairns, R. Richards, et al. (1.5).
10/29/22	T. Moyron	1.10	869.00	B320	Analyze LT agreement and various proposed amendments (.6); correspond with R. Richards re LT agreement (.2); analyze emails from M. Power, et al., re LT Agreement (.3).
10/29/22	T. Moyron	1.20	948.00	B320	Analyze GT plan modifications and plan and LT agreement in connection therewith (.8); analyze plan and required changes regarding debtors dissolution and employees (.4).
10/29/22	T. Moyron	0.70	553.00	B320	Correspond with S. Alberts re A. Samples dec (.2); analyze and prepare amended declaration (.3); correspond with R. Wicks re same (.2).
10/29/22	T. Moyron	1.00	790.00	B320	Conference call with R. Richards re LT agreement (.1); conference call with L. Harrison re Qui Tam (.1); conference call with D. Cook re UST changes (.1); correspond with B. Hackman re UST comments (.1); call with M. Caloway re LT agreement and outstanding items (.2); conference call with C. Montgomery re GT comments and related language (.4).
10/30/22	S. Ruben	0.10	52.50	B320	Correspond with T. Moyron and S. Alberts re finalizing Samples declaration in support of confirmation (.1).
10/30/22	T. Moyron	0.30	237.00	B320	Call with N. Peterman, E. Howe, C. Montgomery, and S. Maizel re open issues.

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Date	Timekeeper	Hours	Amount	Task	Narrative
10/30/22	T. Moyron	1.40	1,106.00	B320	Call with T. Meerovich re outstanding issues re plan (.2); call with M. Caloway re status of pleadings (.2); call with E. Howe re LT agreement (.1); call with D. Cook re plan (.1); call with R. Richards re LT agreement (.1); call with C. Montgomery re Rushmore and other matters (.3); call with L. Macksound re LWLA (.1); call with L. Harrison re qui tam plaintiff (.3).
10/30/22	T. Moyron	2.30	1,817.00	B320	Correspondence regarding LT agreement with R. Richards, T. Meerovich, et al., (.9); correspondence regarding plan and related issues with D. Cook, M. Caloway, et al.,(1.4).
10/30/22	T. Moyron	7.40	5,846.00	B320	Multiple in-persons meetings with Dentons, PSZJ and A. Samples in preparation for hearing and discussions regarding outstanding issues (3.6); prepare for hearing (2.6); analyze outstanding issues with lender and Committee (1.2).
10/30/22	T. Moyron	0.80	632.00	B320	Conference call with N. Peterman, E. Howe, et al., and then follow up call with M. Indelicato (re ousstanding plan issues.
10/30/22	C. Montgomery	1.70	2,057.00	B320	Communications with T. Moyron and D. Cook re plan changes and Trustee exculpation, (.4) review declarations (.1); zoom call with M. Indelicato, T. Moyron, N. Peterman, T. Cairns E. Howe and others re plan modifications (.9); phone calls with T. Moyron and A Samples regarding Class 4 resolution (.3).

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10/30/22	D. Cook	6.20	3,844.00	B320	Further revise plan ahead of confirmation hearing to capture recent negotiated provisions (2.3); zoom conference with Committee, lender, Debtor, and CRO representatives regarding confirmation issues (.6); telephone conference with T. Moyron regarding confirmation issues (.3); follow up telephone conference with T. Moyron regarding same (.1); follow up telephone conference with T. Moyron regarding same (.1); follow up telephone conference with T. Moyron regarding same (.1); follow up telephone conference with T. Moyron regarding same (.1); telephone conference with C. Montgomery regarding plan (.1); telephone conference with T. Moyron regarding revised defined terms in plan and proposed course of action for confirmation hearing (.1); draft email response to B. Hackman regarding UST confirmation issues (.4); analysis regarding same issues in preparation for response (.7); email correspondence with R. Richards regarding quarterly fee/reporting obligations confirmation order language (.1); email correspondence with Dentons/PSZJ regarding UST exculpation objection (.2); analysis in connection with same (.3); draft changes to plan document for circulation to lender counsel (.4); email correspondence with lender counsel regarding same (.1); email correspondence with FTI and Dentons regarding budget plan exhibits (.2).
10/30/22	L. Macksoud	1.60	1,232.00	B320	Calls with T. Moyron and C. Montgomery re various open issues in advance of confirmation hearing (.5), confer with FTI re LWLA objection (.3), participate in call with MassMutual to discuss remittance (.8).
10/30/22	S. Maize1	12.20	11,834.00	B320	Preparing for hearing on confirmation of combined plan and disclosure statement (12.0); telephone conference with T. Moyron re same (.2).

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Date	Timekeeper	Hours	Amount	Task	Narrative
10/31/22	L. Macksoud	12.90	9,933.00	B320	Prepare for (5.8) and participate in confirmation hearing (4.5), update and revise plan and confirmation order per resolutions reached at hearing and per direction of court (2.2), further discussions with counsel to Lynx re claim (.4).
10/31/22	S. Alberts	7.40	7,326.00	B320	Receive, review and consider argument outline from S. Maizel concerning WARN issues (.3), request (.1) and receive and review information from FTI concerning actual RIF numbers by location (.1), follow up for addition information (.1), draft and supplement S. Maizel draft arguments (1.8), receive request for clarification from S. Maizel concerning critical facts for each WARN defense (.1) and respond conference with S. Maizel (.2), conference with S. Maizel concerning WARN defenses in preparation of confirmation hearing (.3), receive and consider UST question (.2) communicate with T. Moyron about UST question responses (.2), request research from C. Doherty on certain WARN issues per S. Maizel request (.2), receive and review research response (.2) and follow up with C. Doherty (.2), follow up inquiry to FTI concerning per week calculation of Plano separated employees (.1), receive, review and forward FTI's response (.1), follow up communications with C. Doherty concerning liquidating fiduciary defense issues (.3), attend confirmation hearing (2.9).
10/31/22	S. Schrag	0.10	65.00	B320	Participate in reoccurring call to discuss Confirmation Hearing matters.
10/31/22	S. Maizel	9.50	9,215.00	B320	Prepare for hearing on confirmation of the combined plan and disclosure statement (6.0); participate in hearing on confirmation of combined plan and disclosure statement and related motions, etc. (3.5).

First Guaranty Mortgage Corporation  
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November 30, 2022

Date	Timekeeper	Hours	Amount	Task	Narrative
10/31/22	T. Moyron	10.70	8,453.00	B320	Prepare for hearing, including analysis of cases related to qui tam plaintiff and Debtor's objection (3.2); further preparation for hearing on confirmation of the combined plan and disclosure statement and meetings with S. Maizel, T. Meerovich, L. Jones re same (6.0); calls regarding plan matters with N. Peterman (.2), Committee counsel (.1); zoom meetings with Bravo, GT, Committee, FTI, et. regarding budget and plan language and analyze related issues (1.2).
10/31/22	D. Cook	11.80	7,316.00	B320	Revise Plan in preparation for confirmation hearing (2.8); revise specified assets exhibit relating to same (.4); discuss LWLA issue with Dentons team (.3); research with respect to same (.5); analyze employment separation timeline with respect to WARN issue (.3); analysis with respect to previously filed wage materials with respect to WARN issue (.2); telephone conference with UCC counsel and Greenberg counsel with respect to reporting of liquidating trust (.7); analysis with respect to DIP and Trust Budgets relating to Plan (.5); analyze references to trust budget in plan for use in credit agreement in aid of confirmation (.2); analyze draft confirmation order for language to resolve UST issues (.2); telephone conference with UST regarding UST issues (.1); attend confirmation hearing (3.0); further revise plan in light of changes as a result of hearing (2.6).
10/31/22	E. Smith	4.40	4,510.00	B320	Attended plan confirmation hearing via zoom (4.0); prepared language to be inserted into the confirmation order approving FGMC's settlement with MSR purchaser (.4).
10/31/22	T. Moyron	3.50	2,765.00	B320	Participate in hearing on confirmation of combined plan and disclosure statement and related motions.
	Subtotal	385.10	318,385.00		

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B400 - Bankruptcy-Related Advice

Date	Timekeeper	Hours	Amount	Task	Narrative
10/05/22	L. Macksoud	1.10	847.00	B400	Call with C. Montgomery to discuss open issues relating to Multibank, Flagstar, Quiet Title litigation and payment on DIP lender invoices (.5), follow up with client on Multibank wire and confirm same (.2), draft email to Flagstar's counsel re payment on loan (.1), confer with FTI re DIP Lender invoice (.1), draft multiple emails to address quiet title action (.2).
Subtotal		1.10	847.00		

EMP - Employee matters

Date	Timekeeper	Hours	Amount	Task	Narrative
10/07/22	S. McCandless	0.80	788.00	EMP	Communicate with T. Moyron regarding overall status of employment matters; related review of latest communications.
10/08/22	S. McCandless	0.20	197.00	EMP	Communicate with D. Oien and T. Moyron regarding status of pending employment matters.
10/14/22	M. Harriss	2.50	1,137.50	EMP	Strategize with Dentons team regarding upcoming conference with plaintiffs' counsel in WARN class action (1.3); receive and begin to review and analyze Plaintiffs' motion for class certification and related relief, and exhibits thereto (1.2).
10/19/22	M. Harriss	4.40	2,002.00	EMP	Plan and prepare for call with opposing counsel in WARN Act class action, and appear and attend same (2.2); further review of plaintiffs' motion for class certification in WARN claims and several exhibits attached thereto (2.2).

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Date	Timekeeper	Hours	Amount	Task	Narrative
10/21/22	M. Harriss	2.30	1,046.50	EMP	Further review of plaintiffs' motion for class certification of WARN claims and various declarations cited in support of same (.8); receive, review, and analyze proof-of-claim information and various communications regarding same (.8); meet with S. Alberts to strategize regarding opposition to class certification; review additional caselaw to develop opposition arguments (.7).
10/22/22	M. Harriss	2.80	1,274.00	EMP	Conduct research regarding motions for class certification of WARN Act claims, particularly with respect to Rule 23 issues of commonality, predominance, typicality, and the rigorous analysis the trial court must conduct, and develop and draft Rule 23 arguments to raise in opposition to Plaintiffs' motion for class certification.
10/23/22	M. Harriss	2.50	1,137.50	EMP	Review and analyze Third Circuit case law on issues of certification standard of proof, plaintiffs' evidentiary burden, and other more technical elements of Rule 23 analysis (1.5); finish work to develop and draft additional (non-WARN specific) arguments to raise in opposition to plaintiffs' motion for class certification (1.0).
10/24/22	M. Harriss	5.40	2,457.00	EMP	Prepare and draft brief in opposition to plaintiffs' motion for class certification, including work to draft legal-standard section for both Rule 23 and WARN Act, as well as multiple argument sections addressing ascertainability, predominance, and Plaintiffs' failure to satisfy other Rule 23 requirements, including research of Third Circuit case law to identify additional supporting authority for arguments and work to incorporate same into brief.
10/25/22	M. Harriss	6.60	3,003.00	EMP	Finish work to develop and draft initial, full draft of brief in opposition to Plaintiffs' Motion for Class Certification, including research to identify authority to support arguments throughout and work to incorporate same into briefing, and work to further develop arguments typicality, adequacy of representation.

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Date	Timekeeper	Hours	Amount	Task	Narrative
10/27/22	M. Harriss	4.50	2,047.50	EMP	Draft separate cover motion for opposition to Plaintiffs' Motion for Class Certification, as well as separately filed certificate of service (1.5); develop and draft statement of the nature and stage of the proceeding for memorandum of law in opposition to class-certification motion, as required by local rules (1.5); additional substantive edits throughout memorandum of law in opposition to class-certification motion, including work to address partner comments and incorporate partner edits; work on table of authorities for briefing; develop and draft declaration of Samples to submit in support of opposition brief (1.5).
10/28/22	M. Harriss	4.10	1,865.50	EMP	Continue to revise and finalize memorandum of law in opposition to plaintiffs' motion for class certification, including multiple calls with partners and work to address comments and incorporate edits, as well as other substantive edits throughout argument (3.0); work with local counsel to finalize and file multiple documents as part of our opposition to plaintiffs' class-certification motion (1.1).
	Subtotal	36.10	16,955.50		

INS - Insurance

Date	Timekeeper	Hours	Amount	Task	Narrative
10/11/22	T. Moyron	0.10	79.00	INS	Call with R. Richards re insurance policies.
10/14/22	T. Moyron	0.90	711.00	INS	Zoom meeting with Lockton, D. Oien, S. Maizel, J. John and R. Richards re claim and related matters.
	Subtotal	1.00	790.00		

WARNACT- WARN Act Issues

Date	Timekeeper	Hours	Amount	Task	Narrative
10/19/22	T. Moyron	1.00	790.00	WARNA	Participate in Zoom settlement meeting with WARN counsel J. Raisner and R. Roupinian, FTI, and Dentons.

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Date	Timekeeper	Hours	Amount	Task	Narrative
10/21/22	T. Moyron	2.10	1,659.00	WARNA	Analyze WARN matters and documents, including complaints, claims excel sheet, POCs, and strategize with respect thereto (1.2); analyze related research (.4); conference call with S. Alberts re same (.4); prepare email to KCC re same POCs (.1).
10/24/22	S. McCandless	2.40	2,364.00	WARNA	Review inquiry from S. Alberts regarding background to WARN notices and related decisions (.10); review earlier factual background for same (.80); respond regarding requested information (.60); review questions from S. Alberts regarding unforeseen circumstances and faltering company exceptions to WARN Act (.10); respond regarding same (.30); further related communications with S. Alberts (.30); provide additional related background to WARN notice (.20).
10/24/22	S. Maizel	0.10	97.00	WARNA	Telephone conference with S. Alberts re opposition to WARN Act claim.
10/24/22	T. Moyron	1.10	869.00	WARNA	Analyze WARN issues, including defenses, brief, and other matters (.8); correspond with S. Alberts, et al., re same (.3).
10/25/22	T. Moyron	0.70	553.00	WARNA	Conference call with WARN counsel, S. Alberts, et al. (.5); follow up with S. Alberts re same (.2).
10/25/22	T. Moyron	0.90	711.00	WARNA	Zoom meeting with S. Alberts, S. Maizel, et al., regarding WARN, including brief and opposition to motion to certify.
10/25/22	T. Moyron	0.50	395.00	WARNA	Attention to WARN matters and inquiries related to opposition and brief (.4); correspond with WARN call re meeting (.1).
10/26/22	T. Moyron	1.30	1,027.00	WARNA	Conference call with GT, M. Schwarzmman, S. Alberts, et al., regarding WARN (.8); call with S. Alberts re WARN, including various complaints, POCs, and other matters (.5).
10/26/22	T. Moyron	1.30	1,027.00	WARNA	Analyze and prepare comments to WARN insert.
10/26/22	R. Wicks	3.40	2,261.00	WARNA	Research related to liquidating fiduciary exception.

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Date	Timekeeper	Hours	Amount	Task	Narrative
10/26/22	J. Peterson	3.00	1,575.00	WARNA	Analyze the WARN Act, the WARN federal regulations, and the WARN notice provided to employees related to the unforeseen business circumstances and faltering company exceptions to determine how each exception is applicable in response to opposing counsel stating that they would be challenging the WARN Notice as insufficient.
10/26/22	J. Peterson	2.00	1,050.00	WARNA	Analyze case law related to the unforeseen business circumstances and faltering company exceptions to determine how each exception is applicable in response to opposing counsel stating that they would be challenging the WARN Notice as insufficient.
10/27/22	J. Peterson	1.00	525.00	WARNA	Review the WARN insert to the opposition to Plaintiff's motion for class certification for accuracy with the law.
10/27/22	S. Maizel	1.60	1,552.00	WARNA	Zoom conference with T. Moyron, etc. re motion to estimate WARN Act claims and related issues (1.0); review and respond to emails re WARN Act related issues (.6).
10/27/22	R. Wicks	5.00	3,325.00	WARNA	Revise WARN Act insert in confirmation brief.
10/27/22	R. Wicks	1.20	798.00	WARNA	Draft WARN Objection Reply.
10/27/22	T. Moyron	1.20	948.00	WARNA	Analyze WARN brief and declaration (.8); conference calls and correspond with R. Wicks regarding changes and related matters (.4).
10/27/22	T. Moyron	0.80	632.00	WARNA	Conference call with S. Alberts, S. Maizel, M. Caloway and L. Jones re WARN (.7); and follow up call with S. Maizel thereafter (.1).
10/28/22	T. Moyron	0.90	711.00	WARNA	Conference call with N. Peterman, S. Alberts, et al., re WARN (.3); analyze updated redlines regarding WARN insert and opposition to motion to certify class (.4); conference calls with S. Alberts re WARN (.2).
10/28/22	T. Moyron	1.00	790.00	WARNA	Analyze opposition to motion to certify WARN class (.8); correspond with M. Harris, et al., re same (.2).

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Date	Timekeeper	Hours	Amount	Task	Narrative
10/28/22	R. Wicks	2.00	1,330.00	WARNA	Prepare WARN Act Reply.
10/28/22	S. Maize1	1.00	970.00	WARNA	Review and respond to emails re opposition to motion to certify class (.3); telephone conference with T. Moyron re same (.1); telephone conference with M. Caloway re same (.1); review and revise motion to oppose certification and related documents (0.5).
Subtotal		35.50	25,959.00		

#### TIME AND FEE SUMMARY

<u>Timekeeper</u>	<u>Rate</u>	<u>Hours</u>	<u>Fees</u>
C. Montgomery	\$1,210.00	175.30	\$212,113.00
J. Harrington	\$1,175.00	4.40	\$5,170.00
S. Alberts	\$990.00	64.60	\$63,954.00
S. Maize1	\$970.00	83.70	\$81,189.00
T. Moyron	\$790.00	181.70	\$143,543.00
C. O'Leary	\$850.00	4.00	\$3,400.00
E. Smith	\$1,025.00	37.70	\$38,642.50
G. Miller	\$770.00	32.70	\$25,179.00
J. Murphy	\$1,045.00	6.10	\$6,374.50
L. Harrison	\$1,140.00	23.00	\$26,220.00
L. Macksoud	\$770.00	97.60	\$75,152.00
R. Richards	\$940.00	38.60	\$36,284.00
R. Williams	\$1,040.00	5.00	\$5,200.00
S. McCandless	\$985.00	28.30	\$27,875.50
J.A. Moe, II	\$760.00	14.50	\$11,020.00
L. Whidden	\$970.00	4.40	\$4,268.00

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<u>Timekeeper</u>	<u>Rate</u>	<u>Hours</u>	<u>Fees</u>
C. Doherty, Jr.	\$695.00	26.40	\$18,348.00
M. Harriss	\$455.00	35.10	\$15,970.50
R. Wicks	\$665.00	60.30	\$40,099.50
S. Dhaliwal	\$780.00	7.60	\$5,928.00
D. Cook	\$620.00	64.30	\$39,866.00
S. Schrag	\$650.00	21.80	\$14,170.00
J. Peterson	\$525.00	6.00	\$3,150.00
P. Shah	\$575.00	9.60	\$5,520.00
S. Ruben	\$525.00	44.30	\$23,257.50
G. Medina	\$360.00	18.10	\$6,516.00
K.M. Howard	\$340.00	<u>0.60</u>	<u>\$204.00</u>
Totals		1,095.70	\$938,614.00

First Guaranty Mortgage Corporation  
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SUMMARY OF AMOUNT DUE BY TASK CODE

Task Code	Task Code Name	Fees
B110	Case Administration	52,937.50
B130	Asset Disposition	48,985.50
B140	Relief from Stay/Adequate Protection Proceedings	23,808.00
B150	Meetings of and Communications with Creditors	6,119.00
B160	Fee/Employment Applications	13,615.00
B185	Assumption/Rejection of Leases and Contracts	56,976.00
B190	Other Contested Matters (excl. assumption/rejection motions)	54,832.50
B220	Employee Benefits/Pension	4,347.00
B230	Financing/Cash Collections	125,987.50
B240	Tax Issues	15,019.50
B260	Board of Directors Matters	2,205.50
B300	Claims and Plan	119,724.00
B310	Claims Administration and Objections	51,120.50
B320	Plan and Disclosure Statement (incl. Business Plan)	318,385.00
B400	Bankruptcy-Related Advice	847.00
EMP	Employee matters	16,955.50
INS	Insurance	790.00
WARNA CT	WARN Act Issues	25,959.00
	Total This Matter	\$938,614.00

DISBURSEMENT DETAIL

<u>Date</u>	<u>Description</u>	<u>Amount</u>
10/31/2022	Delivery & Postage By hand delivery for G, Medina	28.01
10/31/2022	Delivery & Postage By hand delivery for G. Medina	47.01
	SUBTOTAL	75.02

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<u>Date</u>	<u>Description</u>	<u>Amount</u>
10/15/2022	Lexis MONTGOMERY\ CLAUDE	27.47
10/15/2022	Lexis MONTGOMERY\ CLAUDE	49.23
10/15/2022	Lexis MONTGOMERY\ CLAUDE	205.18
10/25/2022	Lexis WICKS\ REBECCA	95.00
10/26/2022	Lexis WICKS\ REBECCA	49.50
10/26/2022	Lexis COOK\ DAVID	48.52
10/27/2022	Lexis MONTGOMERY\ CLAUDE	51.36
10/30/2022	Lexis WICKS\ REBECCA	99.00
10/31/2022	Lexis MOYRON\ TANIA	153.30
	SUBTOTAL	778.56
10/1/2022	PUBLICATION FEE 1504 CNS case trackers	10.50
	SUBTOTAL	10.50
10/20/2022	WESTLAW WICKS\REBECCA	450.00
10/21/2022	WESTLAW WICKS\REBECCA	225.00
10/24/2022	WESTLAW WICKS\REBECCA	585.00
10/25/2022	WESTLAW WICKS\REBECCA	505.00
10/26/2022	WESTLAW WICKS\REBECCA	182.50
10/26/2022	WESTLAW PETERSON\JESSICA	75.00
10/26/2022	WESTLAW COOK\DAVID F	300.00
10/27/2022	WESTLAW WICKS\REBECCA	75.00
10/27/2022	WESTLAW COOK\DAVID F	225.00
10/15/2022	WESTLAW MOYRON\TANIA	153.00
10/30/2022	WESTLAW MOYRON\TANIA	225.00
10/31/2022	WESTLAW COOK\DAVID F	600.00
	SUBTOTAL	3,600.50
	Total Disbursements	\$4,464.58
	Total This Matter	\$943,078.58

First Guaranty Mortgage Corporation November 30, 2022  
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COMBINED TOTALS

Total Hours	1,095.70
Fee Total, all Matters	\$ 938,614.00
Disbursement Total, all Matters	\$ 4,464.58
Invoice Total, all Matters	<u>\$ 943,078.58</u>

First Guaranty Mortgage Corporation  
Attn: Aaron Samples  
5800 Tennyson Parkway, Suite 450  
Plano TX 75024  
United States

November 30, 2022

Client #: 15810756

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Statement of Account

According to our records, as of November 30, 2022, the amounts shown below are outstanding.  
If your records are not in agreement with ours, please call us. Thank you.

			Payments/	
<u>Date</u>	<u>Invoice No.</u>	<u>Invoice Amount</u>	<u>Adjustments</u>	<u>Total</u>
08/31/22	2553500	1,585,263.98	(1,265,078.40)	320,185.58
11/23/22	2581247	1,183,947.41	0.00	1,183,947.41
11/30/22	2581314	611,861.83	0.00	611,861.83
11/30/22	2582981	943,078.58	0.00	943,078.58
		Total Outstanding Invoices		<u>\$3,059,073.40</u>

Questions should be directed to:

S. Maizel  
at 1 213 623 9300

Federal Tax ID. Number 36-1796730

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FIRST GUARANTY MORTGAGE  
CORPORATION, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-10584 (CTG)

(Jointly Administered)

**Objection Deadline: December 23, 2022, at 4:00  
p.m. (prevailing Eastern Time)**

**NOTICE OF FILING FEE APPLICATION**

**PLEASE TAKE NOTICE** that Dentons US LLP (“DUS”), counsel to the debtors and debtors in possession (the “Debtors”), in the above-captioned cases, has filed its *Fourth Monthly Application for Compensation and Reimbursement of Expenses of Dentons US LLP, as Counsel to the Debtors’ for the Period from October 1, 2022 through October 31, 2022* (the “Application”) seeking fees in the amount of \$938,614.00 and reimbursement of actual and necessary expenses in the amount of \$4,464.58 for the period from October 1, 2022 through October 31, 2022.

**PLEASE TAKE FURTHER NOTICE** that any objection or response to the Application must be made in writing and be filed with the United States Bankruptcy Court for the District of Delaware (the “Bankruptcy Court”), 824 N. Market Street, 3rd Floor, Wilmington, Delaware 19801, on or before **December 23, 2022, at 4:00 p.m. prevailing Eastern Time.**

**PLEASE TAKE FURTHER NOTICE** that at the same time, you must also serve a copy of the response or objection upon: (i) counsel for the Debtors: (a) Dentons US LLP, 601 S. Figueroa Street, #2500, Los Angeles, CA 90017 (Attn: Tania M. Moyron,

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<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s tax identification number, are: First Guaranty Mortgage Corporation (9575); and Maverick II Holdings, LLC (5621). The location of the corporate headquarters and the service address for First Guaranty Mortgage Corporation is 5800 Tennyson Parkway, Suite 450, Plano, TX 75024.

[tania.moyron@dentons.com](mailto:tania.moyron@dentons.com), and Samuel Maizel, [samuel.maizel@dentons.com](mailto:samuel.maizel@dentons.com)) and (b) Pachulski Stang Ziehl & Jones LLP, 919 North Market Street, 17th Floor, Wilmington, Delaware 19801 (Attn: Laura Davis Jones, [ljones@pszjlaw.com](mailto:ljones@pszjlaw.com)); (ii) Barclays Bank PLC: Hunton Andrews Kurth LLP, 200 Park Avenue, New York, NY 10166 (Attn: Peter S. Partee, [ppartee@huntonak.com](mailto:ppartee@huntonak.com)) and (Brian M. Clarke, [brianclarke@huntonak.com](mailto:brianclarke@huntonak.com)); and Potter Anderson & Corroon LLP, 1313 N. Market Street, 6th Floor, Wilmington, Delaware, 19801 (Attn. Jeremy W Ryan, [jryan@potteranderson.com](mailto:jryan@potteranderson.com)); (iii) counsel to LVS II SPE XXXIV LLC, Greenberg Traurig, LLP., (Attn: Nancy Peterman, [PetermanN@gtlaw.com](mailto:PetermanN@gtlaw.com)), (John D. Elrod, [ElrodJ@gtlaw.com](mailto:ElrodJ@gtlaw.com)), (Joseph Davis [DavisJ@gtlaw.com](mailto:DavisJ@gtlaw.com)), and (Danny Duerdoth, [duerdothD@gtlaw.com](mailto:duerdothD@gtlaw.com)); (iv) the Office of the United States Trustee, 844 King Street, Suite 2207 Lockbox 35, Wilmington, DE 19801, (Attn: Benjamin Hackman [benjamim.a.hackman@usdoj.gov](mailto:benjamim.a.hackman@usdoj.gov)); and (v) counsel for the Official Committee of Unsecured Creditors, (a) Thompson Coburn Hahn & Hessen LLP, 488 Madison Avenue, New York, NY 10022 (Attn: Mark S. Indelicato [mindelicato@thompsoncoburn.com](mailto:mindelicato@thompsoncoburn.com)), (Mark T. Power [mpower@thompsoncoburn.com](mailto:mpower@thompsoncoburn.com)) and (Joseph Orbach [jorbach@thompsoncoburn.com](mailto:jorbach@thompsoncoburn.com)); and (b) Blank Rome LLP, 1201 Market Street, Suite 800, Wilmington, DE 19801 (Attn: Regina Stango Kelbon, [regina.kelbon@blankrome.com](mailto:regina.kelbon@blankrome.com)), (Victoria A. Guilfoyle, [tori.guilfoyle@blankrome.com](mailto:tori.guilfoyle@blankrome.com)) and (Lorenzo R. Thomas III, [Lorenzo.thomas@blankrome.com](mailto:Lorenzo.thomas@blankrome.com)).

**PLEASE TAKE FURTHER NOTICE** that on August 2, 2022, the Bankruptcy Court entered the *Order (I) Approving Procedures for (A) Interim Compensation and Reimbursement of Expenses of Retained Professionals* (the “Order”) [Docket No. 268].

Pursuant to the Order, in the absence of timely filed objections or responses, and upon the filing with the Bankruptcy Court of a certification of no objection, the Debtors are authorized to

pay the professionals eighty percent (80%) of the fees, and one hundred percent (100%) of expenses without further notice or hearing. All fees and expenses paid to the professionals are subject to final approval by the Court.

**PLEASE TAKE FURTHER NOTICE THAT IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE APPLICATION WITHOUT FURTHER NOTICE OR HEARING.**

Dated: December 2, 2022  
Wilmington, Delaware

**PACHULSKI STANG ZIEHL & JONES LLP**

/s/ Mary F. Caloway

Laura Davis Jones (DE Bar No. 2436)  
Timothy P. Cairns (DE Bar No. 4228)  
Mary F. Caloway (DE Bar No. 3059)  
919 North Market Street, 17th Floor  
P.O. Box 8705  
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Tel: (302) 652-4100  
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[tcairns@pszjlaw.com](mailto:tcairns@pszjlaw.com)  
[mcaloway@pszjlaw.com](mailto:mcaloway@pszjlaw.com)

-and-

Samuel R. Maizel (admitted *pro hac vice*)  
Tania M. Moyron (admitted *pro hac vice*)  
**DENTONS US LLP**  
601 S. Figueroa Street #2500  
Los Angeles, CA 90017  
Telephone: (213) 623-9300  
Email: [samuel.maizel@dentons.com](mailto:samuel.maizel@dentons.com)  
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